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HCF GROUP WHISTLEBLOWER POLICY AND PROCEDURE

OCTOBER 2024

HCF GROUP WHISTLEBLOWER POLICY

PURPOSE

The Hospitals Contribution Fund of Australia Ltd (**HCF**) and its subsidiaries (together, the HCF Group) are committed to promoting transparency, accountability and ethical behaviour at all levels, so as to provide the best possible outcomes for our members and for the wider community of which we are part.

Our values-led culture encourages people to speak up when they have *reasonable grounds* to suspect there has been wrongdoing, misconduct or an improper state of affairs at HCF or its subsidiaries.

The purpose of the HCF Group Whistleblower Policy (**Policy**) is to

- set out the rights and responsibilities of HCF and the parties involved in a whistleblower disclosure or investigation; and
- enable individuals to disclose wrongdoing safely, securely and with confidence that they will be protected and supported.

Further detail of HCF Group's processes for raising, receiving, managing and investigating disclosures made under this Policy are set out in the Whistleblower Procedure. For the purpose of statutory compliance, the Whistleblower Procedure should be considered part of the Whistleblower Policy.

By providing a safe and secure means for making whistleblower disclosures, this Policy is one of several policies that together form part of the mitigation and control framework relating to material risks as outlined in HCF's Risk Management Framework and Risk Management Strategy.

APPLIES TO

This Policy applies to HCF, the HCF Group and, specifically, to **eligible whistleblowers**. For the purpose of this Policy, **eligible whistleblowers** are referred to as '**you**.'

SPEAKING UP

Our Values encapsulate the way we do all things and help create the necessary culture for us to realise our core purpose – bringing our human touch to healthcare. Pivotal to this is that we all need to have the courage to speak up and report a concern when we see something that potentially compromises us ethically or legally or see someone behave in a way that does not ring true with our Values. We have a number of policies and procedures in place to help us identify and manage this. Please refer to Associated Documents for examples.

For people currently employed by HCF, you can raise your concern with your manager (or with their manager), or with the Business Risk Advisor or People & Culture Business Partner, or by contacting People & Culture Advisory (hrrservices@hcf.com.au).

However, HCF recognises that there could be situations where additional support is necessary.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the practice of making a confidential disclosure of information when you have reasonable grounds to suspect misconduct, or an improper state of affairs or circumstances relating to HCF or its subsidiaries. It plays an important role in identifying and calling out misconduct and harm to members, customers and to the community.

To encourage people to Speak Up and make reports, there is legislation that provides eligible whistleblowers with legal rights and protections including the *Corporations Act 2001* (Cth) and the *Taxation Administration Act 1953* (Cth).

WHISTLEBLOWER DISCLOSURES

The information you are disclosing under this Policy must relate to misconduct or an improper state of affairs or circumstances. Your disclosure can be about HCF or the HCF Group, or about an officer or employee of HCF or of the HCF Group, where you have reasonable grounds to believe such misconduct has occurred or that such an improper state of affairs or circumstances exists. This may include information that:

- breaches the *Corporations Act 2001* (Cth);
- breaches financial services laws or prudential standards enforced by APRA or ASIC;
- relates to systemic issues that a regulator should know about to properly perform its functions;
- is an offence against any other law of the Commonwealth of Australia that is punishable by a minimum period of 12 months' imprisonment;
- is general malpractice – such as dishonest, fraudulent, corrupt, immoral or unethical conduct, or conduct that may cause harm (e.g. putting a patient's safety at risk);
- is misconduct, or an improper state of affairs or circumstances in relation to HCF's tax affairs;
- is gross misconduct;
- breaches of the HCF Group Code of Conduct;
- represents a danger to the public or the financial system; or
- represents a significant risk to public safety, or the stability of, or confidence in the financial system.

If the information you want to disclose does not meet these criteria, please refer to other policies and procedures listed at Associated Documents.

The disclosure of information will still qualify for protection under this Policy if the information turns out to be incorrect, provided you had reasonable grounds to suspect it was correct. If you make a disclosure, though, without reasonable grounds, HCF may regard this as deliberate false reporting, which may result in disciplinary action for you.

If you are involved in the matter that you are reporting, this Policy does not protect you from disciplinary action or liability. However, HCF will consider voluntary disclosure and full cooperation with an investigation as a mitigating factor when determining what disciplinary action, if any, will be taken.

Subject to applicable laws, HCF will give proper assessment and consideration of every report received and will decide whether a formal investigation is required or whether the matter reported can be resolved internally using relevant HCF framework or policy mechanism.

WHO DO I MAKE A WHISTLEBLOWER DISCLOSURE TO?

If you become aware of misconduct or an improper state of affairs as outlined above and you feel uncomfortable reporting it through standard channels, such as to your immediate manager, HCF has appointed **Your Call** as the independent, external third-party to manage and operate its whistleblowing hotline.

Your Call (24/7 access): **1300 790 228** or **your-call.com.au/hcf**
Your Call enables whistleblower disclosures to be made anonymously, confidentially and outside of business hours. You should quote 'HCFW1932' as the Organisation ID when contacting **Your Call**. HCF strongly encourages you contact the whistleblowing hotline.

You may also make a whistleblower disclosure to any other Eligible Recipient without compromising statutory protections that are in place to protect you throughout the entire process.

Nothing in this Policy prevents you from also contacting ASIC or APRA to make a whistleblower disclosure, for instance regarding suspected breaches of laws supervised by those regulators.

STATUTORY AND HCF PROTECTIONS

If you are an eligible whistleblower and your whistleblower disclosure relates to the criteria given above, and is made to an eligible recipient, there are a number of statutory protections in place to support you in making your disclosure. Those include that you are protected against any disciplinary action by, or civil and criminal liability to the HCF Group in relation to the disclosure.

You can provide your name and contact details when you make a whistleblower disclosure, or you can report anonymously. You can protect your identity for part of, or for the entirety of, the process. You are also protected against reprisals and other detrimental or harmful actions (**Detriment**). You also have the right to inform the Australian Federal Police (though that will not be protected as a whistleblower disclosure under this Policy) and to seek legal advice and representation from a lawyer.

For further information, please refer to the Procedure document which supports this Policy.

In making a disclosure, HCF understands and accepts that you are speaking up and making us aware of something that would otherwise have gone unnoticed and could potentially have led to damages to our members and customers and to our prudential standing as a leading not-for-profit provider of private health insurance services in Australia.

HCF has **zero tolerance** for any detriment that you are exposed to because you have made a whistleblower disclosure, or because another person thinks you may have made a whistleblower disclosure or are planning on making a whistleblower disclosure. If someone, irrespective of their role or seniority within the organisation, intimates, suggests, or threatens to carry out any detrimental action, HCF will take steps to protect you.

A Discloser is also protected from civil and criminal liability in relation to the making of a whistleblower disclosure in accordance with this Policy.

HCF will treat any report of detrimental actions and conduct confidentially. Such actions are in direct conflict with the principles which underpin the HCF Group Code of Conduct and HCF Values; anyone found to be engaging in such behaviour will face serious disciplinary consequences, including up to termination of employment, and may also face action in the courts, where civil and criminal penalties may be applied.

If you believe that anyone has acted contrary to the terms of this Policy, you may raise the matter directly with a member of the Whistleblower Committee. This will be investigated. You may also seek independent advice or lodge a complaint with ASIC or APRA if you believe you have suffered a detriment. Anyone who suffers loss, damage or injury because of a whistleblower disclosure may be entitled to compensation or other orders through the Courts, where HCF has failed to prevent an individual from causing that detriment.

You may access the HCF Employee Assistance Program and any other support you request or is suggested by **Your Call** which, in HCF's opinion is reasonable.

HCF will also treat anyone mentioned in or implicated by a whistleblower disclosure fairly and confidentially, to the extent practicable and appropriate in the circumstances.

EXCLUSIONS

The Policy does not apply to personal, work-related grievances, for instance that relate to interpersonal conflicts, terms of employment, transfers, promotions, performance and discipline, where those do not have any significant implications for HCF or its subsidiaries or otherwise come within the scope of the whistleblowing conduct set out above. Please refer to the policies and procedures listed at Associated Documents.

CONFIDENTIALITY AND CONSENT

When you report something under this Policy, either directly to someone at HCF or through the whistleblower hotline, you will be asked how you would prefer your identity, as the person making a disclosure, to be handled.

HCF will respect your decision to remain anonymous or use a pseudonym, however this can impact the efficiency and effectiveness of HCF's investigation into the matter.

If you reveal your identity in relation to a whistleblower disclosure, HCF will maintain its confidentiality.

HCF may be obliged to divulge your identity to APRA, ASIC or the Australian Federal Police, for instance in connection with an investigation into the whistleblower disclosure. HCF may also disclose it to a legal practitioner for the purpose of obtaining legal advice or representation about the whistleblower provisions in applicable laws.

Otherwise, HCF will obtain your consent before disclosing your identity to any other person.

It is illegal for a person to disclose your identity or information likely to lead to your identification other than in these circumstances.

Please refer to the Whistleblower Procedure document that supports this Policy for more details.

SEEKING LEGAL ADVICE OR REPRESENTATION

The protections in this Policy also apply to any whistleblower disclosure you make to a legal practitioner, in relation to HCF or its subsidiaries, for the purpose of obtaining legal advice or legal representation (even if the legal practitioner concludes that a disclosure is not eligible for protection under applicable legislation and this Policy.)

FURTHER INFORMATION ABOUT THIS POLICY

Questions about how this Policy works, what it covers and how a disclosure might be handled should be directed to the following delegate below (or a member of the Whistleblower Committee, as appropriate):

Name: Stuart Barnard, Head of Legal and Compliance
Phone: 0406 249 457 or 02 9290 0462
Email: sbarnard@hcf.com.au

POLICY AWARENESS & TRAINING

The HCF Whistleblower Policy is located on SharePoint (**Policies**) on to which all employees have access. On an annual basis, it is the responsibility of each member of the Senior Leadership Team (SLT) to ensure members of their team are aware of the Whistleblower Policy and its purpose. It will be provided separately to Eligible Recipients who are not HCF employees. The Policy will also be made available to others entitled to make disclosures under this Policy through HCF's external website.

DEFINITION	
APRA	<ul style="list-style-type: none">Australian Prudential Regulation Authority
ASIC	<ul style="list-style-type: none">Australian Securities and Investments Commission
Detriments	<p>It is illegal for someone to cause or threaten detriment to you (Corporations Act) because they believe or suspect that you have made, may have made, propose to make or could make a whistleblower disclosure. Detriments include:</p> <ul style="list-style-type: none">dismissal / termination of employment;injury to you in your employment;altering your position or duties to your disadvantage;discriminating against you;harassing or intimidating you;harming or injuring you, including psychological harm;damaging your property;damaging your reputation;causing you any other damage <p>Detrimental action does not include administrative action taken to protect an individual who makes a whistleblower disclosure, provided it is reasonable, or managing unsatisfactory work performance in line with HCF's performance management framework.</p>
Eligible Recipient	<p>The following persons to whom you may make a disclosure under this Policy:</p> <ul style="list-style-type: none">Your Call;a member of the HCF Group Whistleblower Committee;a director or senior manager of HCF Group;an internal or external auditor of HCF Group, or a member of an audit team conducting an audit of an HCF Group entity; orthe Appointed Actuary of an HCF Group entity.
Eligible Whistleblower	<p>You must be a current or former:</p> <ul style="list-style-type: none">employee (including permanent, maximum-term, temporary and casual employees), agency staff or contractor of, or consultant to, HCF Group;director / senior manager of HCF Group;supplier or service provider to HCF Group, including paid or unpaid employees and can include volunteers;associate of HCF Group; orspouse, relative or dependent of any of these individuals.
Reasonable Grounds	<ul style="list-style-type: none">Objectively reasonable grounds that a reasonable person in your position would also suspect indicates misconduct or an improper state of affairs or circumstances.

POLICY REVIEW

This policy will be reviewed every two years or more frequently if regulatory changes or relevant concerns warrant it.

ASSOCIATED DOCUMENTS

- HCF Whistleblower Procedure
- HCF Group Code of Conduct
- HCF Group Conflict of Interest (Employee) Policy
- HCF Group Equal Opportunity, Anti-Discrimination, Bullying and Harassment Policy
- HCF Group Fit and Proper Policy
- HCF Inappropriate Behaviour and Unacceptable Conduct Procedure
- HCF Workplace Issues Management Procedure
- HCF Group Information Security Policy
- HCF IT Acceptable Use and Surveillance Policy
- HCF Privacy Policy
- HCF Risk Management Framework

LEGAL FRAMEWORK

- Part 9.4AAAA Corporations Act 2001(Cth)
- ASIC Regulatory Guide RG 270 - Whistleblower Policies
- Part IVD, av Administration Act 1953
- State-based Whistleblowers Protection / Protected Disclosure Acts

DOCUMENT DETAILS

Document Owner	Chief Officer, People and Culture
Business Owner	People and Culture
Review Period	Every two years unless an earlier review is triggered by regulatory changes or relevant concerns.
Date Approved	6 November 2024
Date Reviewed	October 2024
Next Review	October 2026
Approvals	Executive Audit, Risk and Compliance Committee, People Culture and Remuneration Committee for review and recommendation to the Board.

	DATE	SIGNATURE
Chief Officer People and Culture	6 November 2024	Angela Wilcox
Chief Risk Officer	6 November 2024	R. Smith
Head of Legal and Compliance	6 November 2024	Stuart Barnard

HCF GROUP WHISTLEBLOWER PROCEDURE

OCTOBER 2024

PURPOSE

This procedure outlines how HCF Group implements the HCF Group Whistleblower Policy, explaining the process for raising, receiving, managing, and investigating disclosures made under the Policy. For the purpose of statutory compliance, this procedure should be considered part of the Whistleblower Policy.

WHO IT COVERS

This Procedure covers The Hospitals Contribution Fund of Australia Limited (HCF) and its subsidiaries (together, the HCF Group) and applies specifically to current and former:

- employees (including permanent, maximum-term, temporary and casual employees), agency staff and contractors of, and consultants to, HCF Group;
- directors and officers of HCF Group;
- suppliers and service providers to HCF Group, and their employees and volunteers;
- associates of HCF Group; and
- a relative, dependent or spouse of any of these individuals.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the practice of making a confidential disclosure of information when someone has reasonable grounds to suspect misconduct, or an improper state of affairs or circumstances relating to HCF or its subsidiaries.

The right to 'blow the whistle' on poor, unacceptable, unethical, or illegal corporate and individual practices and behaviours in a safe, secure, and confidential manner is important because it:

- exposes wrongdoing and fraud;
- prevents corruption and malpractice; and
- promotes greater transparency and accountability.

As a tool, it helps to maintain integrity within the HCF Group, and contributes to ensuring that the trust members, customers, and the wider community have in HCF and its subsidiaries is not compromised.

MAKING A WHISTLEBLOWER DISCLOSURE

If you have reasonable grounds to suspect misconduct or an improper state of affairs or circumstances at HCF Group, you should contact:

Your Call

Telephone: 1300 790 228

(Mon – Fri 8:30am to 8pm AEST)

Online: yourcall.com.au/hcf (24/7 access)

Quote: HCFW1932 (Organisation ID)

Your Call is the independent third-party which HCF has engaged to manage and operate a Whistleblowing Hotline on its behalf. You can access this hotline whenever you need to – it is confidential, operates outside of business hours, and allows you to make a whistleblower disclosure in writing or verbally. You can also make a disclosure anonymously or under a pseudonym.

When you contact the whistleblower hotline, either by telephone or online, the information you provide will only be received by the operator; the operator will ask you for details about the matter and whether you are comfortable sharing your identity or not.

If you want to withhold your identity or make your whistleblower disclosure under a pseudonym for part or for the entirety of the process, it is important that you declare this from the outset. Choosing to remain anonymous will not affect how seriously your whistleblower disclosure is treated or investigated, though it may impact the effectiveness of the investigation.

The operator will explain the next steps and ask for your permission to share the whistleblower disclosure with the HCF Whistleblower Committee, which consists of the *Chief Financial Officer, the Chief Officer, People & Culture and the Chief Risk Officer*, or their delegates. The operator will assess whether the whistleblower disclosure potentially creates a conflict of interest with, or involves, any member of the committee. Where the operator suspects involvement or a conflict of interest, they will not notify that member of the whistleblower disclosure.

Escalation: In the event that one or more members of the Whistleblower Committee are involved or are conflicted, the operator will escalate the whistleblower disclosure to the *CEO and Managing Director*, unless they are also suspected of being involved, and the Chair and the HCF Board.

We encourage you to maintain two-way communication with the whistleblower hotline, after making a disclosure, which can be done while maintaining anonymity if preferred. This may improve the effectiveness of any whistleblowing investigation. You are, however, entitled to refuse to answer any questions put to you, though this may impact the effectiveness of the investigation.

You may also make your whistleblower disclosure directly to a member of the Whistleblower Committee. You must state that you are making a whistleblower disclosure under the HCF Group Whistleblower Policy and whether you want to withhold your identity or make your whistleblower disclosure under a pseudonym for part or for the entirety of the process.

Alternatively, you may make your whistleblower disclosure to any other eligible recipient. Again, you must state that you are making a whistleblower disclosure under the HCF Group Whistleblower Policy and whether you want to withhold your identity or make your whistleblower disclosure under a pseudonym for part or for the entirety of the process.

The eligible recipient will then inform the Whistleblower Committee of the matter, and also of your identity if you have provided them with consent to do so. The eligible recipient will then follow the Whistleblower Committee's directions in relation to the disclosure.

CONFIDENTIALITY AND CONSENT

HCF will seek your consent for your identity to be disclosed to all, or some, of the persons involved in the consideration and investigation of your disclosure. Equally also, you may wish to remain completely anonymous when you are making

a whistleblower disclosure, including for the duration of any investigation and beyond. This means that you are not obliged to answer any questions or provide additional information that could potentially reveal your identity. However, this may impact on the efficiency and effectiveness of any investigation into the matter.

The importance of confidentiality extends also to the role played by the Whistleblower Committee and any appointed investigator. All details relating to the whistleblower disclosure and any information that emerges as part of an investigation will be stored securely and access to this information is allowed only in accordance with the terms of the Policy and this Procedure. In passing on any information, all parties involved will take care to maintain confidentiality and minimise the risk of revealing your identity, for instance by using gender neutral language and removing aspects of the information which could point towards your role at HCF.

PUBLIC INTEREST AND EMERGENCY DISCLOSURES

You can also make whistleblower disclosures to ASIC, for instance about suspected breaches of the Corporations Act 2001 (Cth) or conditions of the Australian Financial Services (AFS) License.

Similarly, you can also make disclosures to APRA, for instance about suspected breaches of the Life Insurance Act 1995 (Cth), Private Health Insurance Act 2007 (Cth), or associated regulations or prudential standards that apply to HCF Group. You are entitled to make a public interest disclosure by disclosing information to a journalist or to a parliamentarian (state or federal) subject to the following:

- You must have made a whistleblower disclosure to ASIC or APRA and informed that regulator in writing of your intention of making a public interest disclosure regarding the matter; and
- A minimum of 90 days must have passed since you made the initial whistleblower disclosure to ASIC/APRA; and
- You do not have reasonable grounds to believe that action is being taken, or has been taken, in relation to the whistleblower disclosure; and
- You have reasonable grounds to believe that making a further disclosure of the information is in the public interest.

Similarly, you are entitled to make an emergency disclosure by disclosing information to a journalist or to a parliamentarian (state or federal) subject to the following:

- You must have made a whistleblower disclosure to ASIC or APRA and informed that regulator in writing of your intention of making an emergency disclosure regarding the matter; and
- You have reasonable grounds to believe that information subject to the whistleblower disclosure concerns a substantial and imminent danger to the health and safety of one or more persons, or to the natural environment; and
- You must not add to or embellish information in an emergency disclosure, and only inform a journalist or parliamentarian of the substantial and imminent danger.

THE ROLE OF THE WHISTLEBLOWER COMMITTEE

The Whistleblower Committee plays an important role in fostering a culture at HCF where employees feel comfortable raising concerns and reporting misconduct.

The Committee will convene within one business day of receiving a whistleblower disclosure from the whistleblower hotline or from another eligible recipient. The Committee will assess the whistleblower disclosure to determine whether it falls within the scope of the HCF Group Whistleblower Policy and whether an investigation is warranted. Where an investigation is warranted, the Whistleblower Committee will:

- plan the nature, scope and timeframe for the investigation (which will vary depending on the nature of the disclosure);
- appoint an investigator it believes has the appropriate skills and expertise required based on the area of the disclosure, and who is operationally independent of the area under investigation;
- oversee and support the investigation of the disclosure (including receiving progress reports); and
- review the final report and decide what action will be taken.

The Committee will only divulge information to an investigator when it is reasonably necessary for the investigation and will ensure that all details pertaining to the whistleblower disclosure and an investigation are held in confidence and stored securely, and that access to any information is only provided in accordance with the Policy and this Procedure.

Where you agree to be contacted in relation to a disclosure, the Whistleblower Committee will provide you with updates on any investigation and the outcome of the disclosure as considered appropriate.

The Whistleblower Committee will maintain appropriate records regarding each step in the process for dealing with whistleblower disclosures as set out in the Policy and this Procedure, including reports, communications and other documents prepared in relation to the disclosure.

YOUR RESPONSIBILITIES

All employees are expected to:

- comply with the **Code of Conduct** Policy Framework, the HCF Group Whistleblower Policy and this Procedure;
- not make vexatious claims against other employees;
- treat others in a fair, dignified, and respectful manner during any investigation into a whistleblowing disclosure.

DOCUMENT REVIEW

This document is subject to a biennial review, unless an earlier review is triggered by changes to the policy, changes to the regulatory landscape or other relevant concerns.



More information

Go to **Policies**



Need help?

If you have any questions relating to this Policy or Procedure, please speak with your line manager, business Risk Advisor, People & Culture Business Partner, or P&C Advisory hrrservices@hcf.com.au.