NRT GROUP

NRT GROUP

WHISTLEBLOWER POLICY

2026

Approval Record

Function	Position	Name	Signature	Date
Reviewed by	Finance & Commercial Director	Amanda Hayes		Feb 8, 2026
Approved by	CEO	Phil Dark		Feb 11, 2026

Amendment Record

Date	Revision	Amendment Description	By	Initials
25/08/2023	01	Initial Release	Rebecca Bassett	RB
24/01/2025	02	Annual update, including update to NRT Group CEO	Rebecca Bassett	RB
30/01/2026	03	Annual Update – General alignment of all Policy headings and wording	Rebecca Bassett	RB

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1. Introduction

NRT Group is committed to fostering a standard of conduct and ethical behaviour, that encourages employees and all stakeholders to speak up in relation to matters that are of concern to them. This Whistleblower Policy (**Policy**) is intended to provide a mechanism for the reporting of concerns regarding alleged unlawful conduct or other misconduct in the NRT Group work environment, having regard to and in accordance with the requirements of Part 9.4AAA of the *Corporations Act 2001* (Cth) (**Corporations Act**), as amended by the *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019* (Cth).

2. Scope

This Policy applies to:

- NRT Group employees both current and former (including full-time, part-time, casual, contract and fixed-term employees);
- all stakeholders of NRT Group, including but not limited to officers, contractors, auditors, advisers, consultants and their relatives,
- all directors and officers of NRT Group; and
- work experience participants and volunteers,

(collectively, **Workplace Participants**).

3. Purpose

The purpose of this Policy is to:

a) Provide protections for Workplace Participants who report allegations of any "**Disclosable Matters**" (defined below);
b) Improve culture and transparency on how to disclose Disclosable Matters;
c) Encourage more Workplace Participants to disclose Disclosable Matters;
d) Ensure that, where deemed necessary, lawfully required and appropriate by NRT Group, allegations of a Disclosable Matter are investigated; and
e) Deter wrongdoing by promoting better compliance with laws and increasing awareness that it's likely wrongdoing will be reported.

4. What does this Policy cover?

For the purpose of this Policy, "**Disclosable Matters**" include information where the discloser has reasonable grounds to suspect that the information concerns misconduct, or an improper state of affairs or circumstances in relation to NRT Group. Disclosable Matters include, without limitation, concerns or conduct involving or constituting:

a) dishonesty;
b) fraud;
c) corruption;
d) conflicts of interest;
e) misconduct, including negligence, default, breach of trust or breach of duty;
f) an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
g) a danger to the public or the financial system.

To the extent that any Disclosable Matter involves a breach (or a suspected breach) of the Corporations Act, this Policy is intended to complement the protections provided under Part 9.4AAA of the Corporations Act but does not replace or supplant the Corporations Act. Where there is any inconsistency between the Corporations Act and this Policy, the Corporations Act will prevail to the extent of that inconsistency.

NRT Group considers that Disclosable Matters which are covered by this Policy include information where the discloser has reasonable grounds to suspect that NRT Group, or a Workplace Participant of NRT Group, has engaged in conduct which constitutes an offence against, or a contravention of, a provision of any of the following:

a) the Corporations Act;
b) the *Australian Securities and Investments Commission Act 2001* (Cth);
c) the *Banking Act 1959* (Cth);
d) the *Financial Sector (Collection of Data) Act 2001* (Cth);
e) the *Insurance Act 1973* (Cth);
f) the *Life Insurance Act 1995* (Cth);
g) the *National Consumer Credit Protection Act 2009* (Cth);
h) the *Superannuation Industry (Supervision) Act 1993* (Cth); or
i) an instrument made under an Act referred to in subsections (a) to (h) above.

The deliberate concealment of information tending to show that NRT Group, or a Workplace Participant of NRT Group, has engaged in conduct which constitutes an offence against, or a contravention of, a provision of any of the legislation or instruments listed above is also a Disclosable Matter under this Policy.

5. What does this Policy not apply to?

Conduct that is not reportable under this Policy, include matters that only affect the discloser personally, for example work-related grievances or disciplinary decisions. Matters that do not have any implications for NRT Group do not fall under this Policy and would not qualify for protection under the Corporations Act. These matters are dealt with by other NRT Group Policies (for example the Grievance and Appeals Policy.)

6. Who is a Whistleblower?

Workplace Participants are entitled, whether anonymously or not, to make or attempt to make a report in connection with a Disclosable Matter (**Whistleblower**). A Whistleblower who identifies themselves when making a report of a Disclosable Matter may wish to seek protection against reprisal for having made the report. This Policy affords protection to Whistleblowers in certain circumstances.

7. How and to whom a disclosure can be made

A disclosure can be made either formally or informally. All complaints or allegations of a Disclosable Matter should provide specific, adequate and pertinent details and information including but not limited to:

a) relevant dates;
b) location or places;
c) persons, including any witnesses; and
d) any other relevant information,

in order to allow for the complaint to be properly understood and for a reasonable investigation to be conducted if deemed necessary by NRT Group.

Whilst not intending to discourage Whistleblowers from reporting matters of genuine concern, Whistleblowers must ensure so far as possible, that reports are factually accurate, complete, from first-hand knowledge, presented in an unbiased fashion (with any possible perception of bias of the Whistleblower being disclosed) and without material omission.

Workplace Participants are encouraged to raise concerns regarding any perceived or actual wrongdoing internally with their senior manager.

If a Workplace Participant doesn't feel comfortable raising concerns with their immediate manager, they may raise their concerns with any of the following people:

Phil Dark, CEO	Phil.Dark@nrt.com.au	0406 499 086
Robert Welby, Technical and Delivery Director	Robert.Welby@nrt.com.au	0426 427 882
Amanda Hayes, Finance & Commercial Director	Amanda.Hayes@nrt.com.au	0426 282 122

Whistleblowers can also disclose their concerns anonymously via post, to NRT Group, Attention to the CEO, Level 43, Rialto Tower South, 525 Collins Street, Melbourne VIC 3000. Where a Whistleblower makes a disclosure anonymously, subject to limited statutory circumstances, NRT Group cannot disclose this information without the Whistleblower's consent. However, NRT Group may face difficulty investigating or internally addressing or correcting the alleged misconduct unless the Whistleblower provides some approval for NRT Group to use the Whistleblower's information.

If a Whistleblower makes a disclosure anonymously, they will have the same protections regardless.

We expect Whistleblowers making a disclosure to act in good faith, honestly and be genuinely disclosing misconduct. If it's ultimately found that a disclosure was made for malicious reasons, NRT Group reserves the right to take appropriate action.

Whistleblowers may also choose to make your disclosure externally to any of the relevant authorities. Whistleblowers who do this will have access to the same protections as set out in this Policy.

8. After a disclosure is made

Workplace Participants are entitled to make a disclosure without any fear of reprisal or personal disadvantage where your disclosure has been made in good faith.
NRT Group will not penalise, dismiss, demote, suspend, threaten or harass a Whistleblower, or transfer the Whistleblower to an undesirable job, or location, or discriminate in any manner against the Whistleblower, or take reprisals, or retaliate, as a result of the Whistleblower having reported any alleged Disclosable Matter. However, this protection may not apply where the Whistleblower is a participant in the alleged Disclosable Matter.
Workplace Participants must not take any reprisals, victimise, retaliate, harass, intimidate, harm, injure, damage property of or reputation of, or discriminate against a Whistleblower as a result of the Whistleblower having reported any alleged Disclosable Matter. NRT Group considers any reprisals against a Whistleblower to be a serious breach of this Policy which may result in disciplinary measures, up to and including termination of a Workplace Participant's employment or engagement with NRT Group. This protection applies to any Workplace Participant providing information related to an investigation pursuant to this Policy.
A Whistleblower who believes they have been the victim of reprisals or retaliation by reason of their status as a Whistleblower, or any other Workplace Participant who believes they have been the victim of reprisals or retaliation because they have participated in, or assisted with an investigation of a Disclosable Matter, should immediately report the matter to a director of NRT Group. Where an incident of this nature occurs, an investigation and/or disciplinary action, in the absolute discretion of NRT Group, may follow.
A Whistleblower who was or is involved in the Disclosable Matter may, in NRT Group's sole and absolute discretion, be provided with immunity from NRT Group's disciplinary proceedings. However, NRT Group has no power to provide immunity from criminal or civil prosecution, although under the Corporations Act a Whistleblower may qualify for protection against civil, criminal or administrative liability for making a disclosure. Please also be aware that a Whistleblower who is subjected to any "detrimental conduct" (as defined by the Corporations Act) may also seek a court order against any person engaging in such conduct against them.

Any disclosure made by a Whistleblower, will be treated fairly and reasonably, and all efforts will be made not to identify the Whistleblower without their consent.

9. Confidentiality

All complaints or allegations received of a Disclosable Matter are treated on a confidential basis and are protected by this Policy and at law.

NRT Group recognises that maintaining appropriate confidentiality is important in ensuring that potential Whistleblowers come forward and disclose their knowledge or suspicions about a Disclosable Matter in an open and timely manner and without fear of reprisals or retaliation.

NRT Group will take all reasonable steps to protect the identity of a Whistleblower, and will adhere to any statutory requirements in respect of the confidentiality of disclosures made.

Subject to Corporations Act, the identity of the Whistleblower will be kept strictly confidential, however there may be circumstances where the disclosure of the identity of Whistleblower, or the allegation made by them may be unavoidable including:

a) the Whistleblower consents to the disclosure; or
b) NRT Group is required by law to disclose the Whistleblower's identity; or
c) for the purpose of obtaining advice in relation to the whistleblower provisions of the Corporations Act.

10. Investigating a disclosure

All disclosures will be treated seriously, fairly and objectively, with all legal protections afforded.

The subject person of a disclosure will also be treated fairly, objectively and have available to them, any protections afforded by law.

Disclosures will be assessed for relevance to any of the issues mentioned in this Policy, and a reasonable determination will be made whether an investigation should be conducted. Whether an investigation is conducted, or the nature of any investigation conducted, will necessarily depend on the nature of the disclosure.

The Whistleblower (if the disclosure is not made anonymously) will be advised whether an investigation will be conducted, and the reasons for that decision.

Where an investigation is deemed the appropriate course of action, it will be conducted fairly and as timely as possible, by an appropriately appointed person, depending on the nature of the disclosure made.

A director or other representative of NRT Group will determine the appropriate method for the investigation (Investigating Officer). In appropriate cases, the Investigating Officer may ask for the assistance of an internal or an external accounting or legal specialist, or an external investigator, as the Investigating Officer deems necessary.

During the investigation, the Investigating Officer will have access to all of the relevant materials, documents, and records. Evidence, including any materials, documents or records, shall be held by the Investigating Officer, and held securely. NRT Group will take all reasonable steps to comply with any statutory requirements that apply to it in respect of confidentiality and privacy of personal information.

Workplace Participants of NRT Group must cooperate fully with the Investigating Officer. During the investigation, the Investigating Officer will use all reasonable means to protect the confidentiality of the information regarding the Whistleblower, including the identity of the Whistleblower, and to maintain the confidentiality of the participants in the investigation, in accordance with this Policy.

NRT Group may also disclose information or report the matter to an external authority if required by law or disclosure is permitted under the Corporations Act.

The subject person of the disclosure will be advised and given a reasonable opportunity to respond to the disclosure.

Provided the disclosure was not made anonymously, the Whistleblower will be advised on progress of any investigations carried out and the outcome, subject to the considerations of privacy and confidentiality of other Workplace Participants or those against whom allegations are made. The outcome of any investigation must be kept strictly confidential by the Whistleblower unless disclosure is required by law.

The findings of an investigation will be reported to the NRT Group CEO and will remain confidential. NRT Group may decide to take further action depending on the recommendations resulting from any investigations. Where the substantiated allegations concern the conduct of a Workplace Participant, such action may include disciplinary proceedings against the Workplace Participant, including and up to termination of a Workplace Participant's engagement or employment with NRT Group or the referral of the matter to appropriate authorities, as is deemed necessary by NRT Group, or as required by law. Further action may include, an explanation, a resolution or reporting the matter further to external authorities.

11. Policy accessibility

This Policy is available in the offices of NRT Group, Level 3, 116 Miller Street, North Sydney, NSW, 2060, or on the NRT Group Intranet site, and will be reviewed annually.