


# WHISTLEBLOWER POLICY

## November 2026

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# Contents

**Document Control** ..... **1**

**1. Introduction** ..... **4**

**2. Purpose** ..... **4**

**3. Commencement and Scope** ..... **4**

**4. Protected Matters** ..... **5**

4.1 Examples of Protected Matters ..... 5

4.2 Personal work-related grievances ..... 5

4.3 Anonymity ..... 6

**5. Who Can A Protected Matter Be Disclosed To?** ..... **6**

5.1 Internal disclosure details ..... 6

5.2 External disclosure details ..... 7

**6. Investigation** ..... **7**

6.1 Updating the Discloser ..... 8

**7. Confidentiality** ..... **8**

**8. Victimisation Prohibited** ..... **9**

8.1 Examples of detrimental conduct ..... 9

**9. Fair Treatment** ..... **10**

**10. Access to this Policy** ..... **10**

**11. Reporting** ..... **11**

**12. Breaches of this Policy** ..... **11**

**13. Variations** ..... **11**

**Annexure A - Additional Australian Requirements** ..... **12**

# 1. Introduction

The Australian Livestock Export Corporation Ltd ("LiveCorp") strives to operate with a culture of ethical and appropriate corporate behaviour in all its business activities. This includes ensuring that LiveCorp acts with integrity, honesty and in accordance with good governance principles.

This Policy sets out:

a) who can be a Discloser under this Policy;

b) what constitutes a Protected Matter;

c) how Protected Matters can be reported;

d) how LiveCorp will respond to a report concerning a Protected Matter; and

e) how LiveCorp will support and protect people who come forward with reports under this Policy.

# 2. Purpose

The purpose of this Whistleblower Policy ("Policy") is to:

- outline LiveCorp's procedures for identifying and reporting genuine concerns about Protected Matters under this Policy pertaining to LiveCorp;
- promote awareness of the protections available for Disclosers under this Policy and associated whistleblower laws;
- encourage all Disclosers under this Policy to have the confidence to speak up if they become aware of a Protected Matter under this Policy, without fear of reprisal; and
- ensure disclosures are dealt with appropriately and on a timely basis.

This Policy is extremely important as it helps to identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing it.

# 3. Commencement and Scope

This Policy is effective from 1 January 2020. It replaces all other LiveCorp whistleblowing policies.

This Policy applies to the following persons who make a disclosure in accordance with this Policy (who are each a "Discloser"):

a) LiveCorp employees and officers (current and former);

b) contractors or suppliers of goods or services to LiveCorp, including their employees (current and former); and

c) relatives (such as a parent, child or sibling), dependants or spouses (including a de facto partner) of an individual referred to at a) or b) above.

This Policy is not intended to create any contractually binding obligation on LiveCorp and does not form part of any contract of employment or other contract for engagement with LiveCorp.

# 4. Protected Matters

## 4.1 Examples of Protected Matters

A Discloser can raise a concern under this Policy where they have reasonable grounds to suspect that the information disclosed concerns a "Protected Matter", being misconduct or an improper state of affairs or circumstances in relation to LiveCorp or its related bodies corporate.

Protected Matters include any actual or suspected conduct on the part of LiveCorp, its related bodies corporate, or employees or officers of LiveCorp or its related bodies corporate, that:

a) amounts to misconduct, such as fraud, negligence, default, breach of trust or breach of duty;

b) is dishonest or corrupt, such as bribery;

c) is of an illegal nature, such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law;

d) is in breach of LiveCorp's policies, such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching LiveCorp's Code of Conduct or other policies or procedures;

e) is a breach of legislation relating to LiveCorp's operations or activities, including the *Corporations Act 2001* (Cth) ("Corporations Act)";

f) is potentially damaging to LiveCorp, a LiveCorp employee or a third party, such as unsafe work practices, environmental damage, behaviour endangering health or safety, or abuse of LiveCorp property or resources;

g) amounts to an abuse of authority;

h) is a serious risk to public health, public safety or the environment;

i) involves victimisation;

j) amounts to any other misconduct or improper state of affairs or circumstances in relation to LiveCorp;

k) may cause financial loss to LiveCorp, damage its reputation or be otherwise detrimental to LiveCorp's interests; or

l) deliberate concealment of any of the above.

A Discloser does not need to be sure that the information disclosed in a disclosure is true and they will not be penalised if their disclosure turns out to be incorrect. However, a Discloser must not make a report that they know to be false. Where a person makes a false report, this will be considered a serious matter and may result in disciplinary action.

If a Discloser would like further information before making a report, they should contact the Whistleblowing Officer (see section 5 below).

## 4.2 Personal work-related grievances

The disclosure of information that amounts to a personal work-related grievance is not generally protected by this Policy and should instead be raised under LiveCorp's Grievance Procedure. A personal work-related grievance is a grievance relating to a person's current or former employment or engagement that has implications for them personally and does not amount to a Protected Matter.

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.

A disclosure about a personal work-related grievance may still qualify for protection and should be raised under this Policy if:

a) it includes information about a Protected Matter;

b) the disclosure has significant implications for LiveCorp or suggests misconduct beyond a Discloser's personal circumstances;

c) the disclosure suggests the entity has breached employment or other laws punishable by imprisonment for a period of 12 months or more; or

d) the Discloser suffers from or is threated with detriment for making a disclosure.

### 4.3 Anonymity

A disclosure about a Protected Matter may be made anonymously under this Policy. As part of this, a person may choose to remain anonymous while making a disclosure, over the course of any investigation and after any investigation is finalised.

A Discloser may refuse to answer questions if they feel that the answer could reveal their identity at any time.

LiveCorp has adopted processes to help protect a Discloser's anonymity, including allowing pseudonyms to be used for the purposes of making disclosures.

## 5. Who Can A Protected Matter Be Disclosed To?

LiveCorp has several options available for a Discloser to make a report about a Protected Matter.

In particular, if a Discloser becomes aware of a Protected Matter, it can be reported to:

a) the Company Secretary of LiveCorp ("the Whistleblowing Officer"); or

b) any Non-executive Director of the Board of LiveCorp.

To assist LiveCorp to address the report, a Discloser should provide as much information as possible, including:

- **Who** was involved, including any witnesses;
- **What** happened, including details of the Protected Matter and any evidence they may have or are aware of (such as documents);
- **When** the Protected Matter took place or is likely to take place, including specific dates and times;
- **Where** the Protected Matter took place or is likely to take place, including all geographic locations and address details;
- **Why** the Protected Matter occurred or may occur in their opinion, including whether there are any breaches of controls; and
- **Whether** they have taken any steps to date to report the matter elsewhere.

### 5.1 Internal disclosure details

The role of the Whistleblowing Officer is to receive reports regarding a Protected Matter.

The Whistleblowing Officer can be contacted on companysecretary@livecorp.com.au.

### 5.2 External disclosure details

If a Discloser would prefer, they can make a report to any Non-executive Director of the LiveCorp Board.

Their contact details can be accessed via the Whistleblowing Officer.

# 6. Investigation

LiveCorp takes reports regarding Protected Matters very seriously. Reports regarding Protected Matters made under this Policy will be received and treated sensitively and will be dealt with promptly and objectively.

LiveCorp's response to a report will vary depending on the nature of the disclosure (including the amount of information provided).

The Whistleblowing Officer (or another person to whom a disclosure is referred in accordance with this Policy) is authorised to review each report and determine (based on any necessary preliminary inquiries) whether the report concerns a Protected Matter and if an investigation is necessary or appropriate in the circumstances. It may not be possible to investigate a report if LiveCorp is not able to contact a Discloser to obtain sufficient information.

A 'discloser protection officer' will also be appointed to protect or safeguard the integrity of the Discloser during an investigation, including by:

a) ensuring information provided by a Discloser or relating to a Discloser's identity is kept confidential in accordance with this Policy; and

b) ensuring that LiveCorp complies with section 8 (Victimisation Prohibited) and section 9 (Fair Treatment) of this Policy when investigating a report in relation to a Protected Matter.

Where an investigation is appropriate and possible, an investigation officer (who may be internal or external to LiveCorp) will be appointed to investigate the matter in a manner that is impartial to both the Discloser and the person(s) or business area reported.

The objective of an investigation is to determine whether there is enough evidence to substantiate the matters reported. The investigation officer is responsible for inquiring into the reported allegations and determining whether they are substantiated, partly substantiated, not able to be substantiated, or unsubstantiated. Although the investigation officer has ultimate discretion to determine the way a report is dealt with under this policy, an investigation will typically involve:

a) gathering evidence, which may include interviewing the person who made the report (where they have disclosed their identity), any person(s) allegedly involved in the Protected Matter and any witnesses; and

b) any employees allegedly involved in the reported Protected Matter being afforded the opportunity to respond to the allegations as and when required by principles of procedural fairness.

Practically, the investigation officer may be able to investigate a matter more thoroughly or ably if a Discloser clearly consents to the disclosure of their identity (or information likely to lead to your identification) during the investigation. Where possible, the investigation officer may discuss this with a Discloser, taking into account their particular circumstances.

The timeframe for conducting investigations will differ depending on the nature of the disclosure, including its complexity, however, all disclosures will be investigated as promptly as is reasonably practicable.

The method for documenting and reporting the findings of an investigation will depend on the nature of the report. Any report prepared in relation to an investigation may be provided to a decision-maker in relation to the matter, subject to applicable confidentiality requirements, and remains the property of LiveCorp. It will not be provided to a Discloser or any other person to whom a report relates.

Where an investigation identifies misconduct or other inappropriate conduct, LiveCorp may take appropriate disciplinary action in its discretion. This may include, but is not limited to, terminating or suspending the employment or engagement of a person(s) involved in any such conduct.

If an investigation finds that criminal activity is likely to have occurred, the matter may be reported to the police and / or other regulatory authorities by the relevant area within LiveCorp.

All employees of LiveCorp must cooperate fully with any investigation that is undertaken.

Employees who are involved in an investigation may access Employee Assistance Program ("EAP") counselling services. The EAP is Drake Wellbeing and can be contacted on 1300 135 600.

### 6.1 Updating the Discloser

The Discloser will be provided with regular updates, assuming the Discloser can be contacted. The frequency and timeframe of updates may vary depending on the nature of the disclosure. Updated may include the following:

a) confirming receipt of the report;

b) advising that an investigative process has begun (where an investigation is appropriate);

c) providing updates on the investigation status (even if there has been no progress); or

d) advising when an investigation has been closed.

While LiveCorp may communicate the findings of an investigation to a Discloser or a person the subject of a report in its absolute discretion, it may not always be appropriate to communicate details of the outcomes of any investigation having regard to confidentiality and privacy considerations.

## 7. Confidentiality

LiveCorp's priority is to support and protect people who raise concerns about a Protected Matter.

LiveCorp will not disclose the identity of a Discloser or information that is likely to lead to identification of the Discloser (which they have obtained directly or indirectly because the Discloser made a disclosure that qualified for protection) unless the Discloser's identity is disclosed:

a) to ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the *Australian Federal Police Act* 1979 (Cth));

b) a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act);

c) to a person or body prescribed by regulations; or

d) with the Discloser's consent.

If a Discloser raises a concern regarding a Protected Matter, information in the disclosure will only be disclosed by LiveCorp if:

e) the Discloser consents to the disclosure of that information;

f) the information does not include or reveal the Discloser's identity; or

g) LiveCorp has taken all reasonable steps to reduce the risk that the Discloser will be identified from the information.

As part of an investigation, this information may need to be disclosed to people such as:

- the Chief Executive Officer or the Chairperson of the Finance, Audit and Remuneration Committee;
- delegates to HR or other managers to make inquiries or to conduct investigations or order external investigations as is deemed appropriate; and
- disclosures to respondents to complaints to ensure that the person/s against whom allegations are made are given the opportunity to respond to any allegations.

If a Discloser does not consent to the limited sharing within LiveCorp of their identity and the information provided by them as needed, this may limit LiveCorp's ability to progress their report and to take any action in relation to their disclosure.

LiveCorp will take steps to protect a Discloser's identity (and any information in their report that is likely to identify them), including by:

- limiting access to information relating to their report; and
- carefully reviewing and potentially de-identifying certain aspects of their report as necessary.

It is noted that the identity of a Discloser may be deduced without there having been a breach of confidentiality or the provisions of this Policy with respect of anonymity, for example, if the nature of the Protected Matter points to one person having made it or the Discloser has told other people about the matters the subject of their report.

If a Discloser believes that the confidentiality obligations outlined in this section have not been complied with, they should immediately report this to the Whistleblowing Officer (see section 5) or an investigation officer if one has been appointed (see section 6). Any breach of these confidentiality protections is illegal and may result in disciplinary action (up to and including termination of employment or engagement).

# 8. Victimisation Prohibited

LiveCorp will not tolerate any acts of detrimental conduct against a Discloser who has reported a Protected Matter, has assisted another employee in reporting a Protected Matter, or has participated in an investigation into a Protected Matter.

Any acts of detrimental conduct are themselves acts of misconduct, which will be dealt with under the LiveCorp Grievance Procedure and may result in disciplinary action (up to and including termination of employment or engagement).

## 8.1 Examples of detrimental conduct

Detrimental conduct can take the form of:

- dismissing an employee;
- injuring an employee in his or her employment;
- altering an employee's position or duties to his or her disadvantage;
- discrimination between an employee and other employees of LiveCorp;
- harassment or intimidation of a person;
- any form of disciplinary action;
- harm or injury to a person, including psychological harm;
- damage to a person's property or reputation;

- damage to a person's business or financial position; or
- any other damage to a person.

Examples of conduct that is not detrimental conduct and is not in breach of this Policy include:

- administrative action that is reasonable for the purpose of protecting a Discloser from detriment; or
- managing a Discloser's unsatisfactory work performance if the action is line with LiveCorp's performance management framework.

Some of the steps that may be taken by LiveCorp to protect Disclosers from detrimental treatment may include:

- monitoring and managing the Discloser's treatment in the workplace;
- providing a mechanism for Disclosers to lodge complaints if they believe their identity has been improperly disclosed or if they believe that they have been subject to victimisation;
- implementing investigation processes where appropriate;
- taking appropriate disciplinary action against any employees or contractors that breach the victimisation or confidentiality provisions of this Policy; and
- providing support services.

Australian laws also provide protections for Disclosers. Further information about these laws is set out at Annexure A to this Policy.

LiveCorp will look for ways to support all Disclosers who raise a concern, but it will not be able to provide non-employees with the same type and level of support that it provides to its employees. Where this policy cannot be applied to non-employees, LiveCorp will still seek to offer as much support as reasonably practicable.

# 9. Fair Treatment

LiveCorp intends to support Disclosers making disclosures about Protected Matters and to put in place procedures to promote fair treatment of Disclosers. Equally, LiveCorp intends to ensure the fair treatment of persons who are the subject of a report.

This will be achieved by:

- handling disclosures confidentially, where practical and appropriate in the circumstances;
- ensuring each disclosure is subject to an assessment and, where appropriate, an investigation that is impartial;
- ensuring secure record keeping processes that restrict information contained in disclosures about Protected Matters to those persons who may receive such information pursuant to this Policy; and
- giving any employees allegedly involved in the reported Protected Matter an opportunity to respond to the allegations as and when required by principles of procedural fairness.

# 10. Access to this Policy

This Policy will be made available to all LiveCorp employees and officers by the following means:

- on implementation, this Policy will be communicated to all employees and officers by way of email;

- this Policy will otherwise be disclosed to employees and officers on commencement of employment; and
- to ensure persons outside of LiveCorp can access this Policy, the Policy will also be published on LiveCorp's website at www.livecorp.com.

# 11. Reporting

The LiveCorp Board will receive summary information in relation to concerns raised under this policy on quarterly basis, including metrics on disclosures made. This may include, for example, a summary of the number, nature and outcome of matters that have been raised under this policy. The Board may also be provided with additional information about any material incidents raised. Information received by the Board will be de-identified as required.

# 12. Breaches of this Policy

All employees, officers and contractors of LiveCorp are required to comply with this Policy at all times as well as the additional Australian requirements set out in Annexure A to this Policy.

Non-compliance with this Policy or applicable whistleblower laws may result in disciplinary action up to and including termination of employment or termination of a contractor's services.

# 13. Variations

This Policy may be varied, amended, replaced or terminated from time to time and at any time at the absolute discretion of the LiveCorp Board.

# Annexure A - Additional Australian Requirements

**How will I be protected if I raise a concern?**

As set out in this Policy, LiveCorp is committed to protecting Disclosers who raise a concern about a Protected Matter.

In addition, the Corporations Act and the *Taxation Administration Act 1953* (Cth) ("Tax Administration Act") give protection to eligible Disclosers who make reports about disclosable matters under those Acts, when the conditions set out below are satisfied.

The purpose of this Annexure is to set out further information regarding the protections which apply under Australian law.

**What conduct amounts to a breach of the Corporations Act or the Tax Administration Act?**

A “disclosable matter” under the Corporations Act will arise where an eligible Discloser makes a report in circumstances where they have reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs in relation to LiveCorp's Australian operations, or the operations of its Australian incorporated entities, including, but not limited to, conduct that:

- constitutes an offence against a range of corporate and financial sector legislation specified under the Corporations Act;
- constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- represents a danger to the public or the financial system; or
- is otherwise prescribed by regulation.

In addition, a disclosure may also be protected as a “qualifying disclosure” under the Taxation Administration Act where a report relates to a breach of Australian tax law or tax-related misconduct.

A report about a “disclosable matter” or a "qualifying disclosure" by an eligible Discloser will be protected under the Corporations Act and the Taxation Administration Act if it is made to the Whistleblowing Officer or a Non-executive Director. These protections are also available in relation to disclosures made to another person specified under those Acts as set out further below.

If a person makes a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation, their disclosure will also be protected even if it does not relate to a “disclosable matter” or a "qualifying disclosure".

Conduct which does not amount to a “disclosable matter” under the Corporations Act or a "qualifying disclosure" under the Taxation Administration Act will not be protected under those Acts.

**Who can make a report?**

The Discloser must be a current or former officer or employee of a LiveCorp company, a contractor or supplier to LiveCorp, an employee of a contractor or supplier, an associate of LiveCorp, or a relative, spouse or dependant of one of these people (or a dependant of their spouse) in order to qualify for the protections under the Corporations Act and/or the Taxation Administration Act.

**What special protections are available to Disclosers?**

The key protections under this Policy and applicable Australian laws are as follows:

*Confidentiality*: Under the Corporations Act (and the Tax Administration Act, where relevant), where a report is made about a “disclosable matter” or a "qualifying disclosure" by an eligible Discloser to the Whistleblowing Officer, a Non-executive Director, or another person specified under those Acts (as set out

below), that eligible Discloser's identity (and information which is likely to identify them) can only be disclosed without their consent, if the disclosure is to:

- ASIC or APRA;
- the AFP;
- the Australian Taxation Commission in respect of tax-related misconduct; or
- a legal practitioner for the purpose of obtaining legal advice or legal representation,

or if it is reasonably necessary to disclose information for the purposes of an investigation, provided their identity is not disclosed and all reasonable steps are taken by LiveCorp to reduce the risk that they will be identified.

It is illegal for a person to identify an eligible Discloser or disclose information in a report about a "disclosable matter" or "qualifying disclosure" made by them that is likely to lead to their identification, other than as set out above. Reports can also be made anonymously and still be protected under the Corporations Act.

*Non-victimisation*: Under the Corporations Act or the Tax Administration Act (where a report relates to tax-related misconduct), a person cannot engage in conduct (or threaten to engage in conduct) that causes detriment to an eligible Discloser (or another person) if:

- that person believes or suspects that a Discloser (or another person) made, may have made, proposes to make, or could make a disclosure that qualifies for protection, and
- the belief or suspicion is the reason (or part of the reason) for the conduct.

Detriment can take the form of:

- dismissal of an employee;
- injury of an employee in their employment or alteration of their duties to their disadvantage;
- discrimination between an employee and other employees of the same employer;
- harassment or intimidation of a person;
- harm or injury to a person, including psychological harm;
- damage to a person's property, reputation, business, financial position, or any other damage; and/or
- threatening to carry out any of the above.

Where these protections apply, an eligible Discloser is also protected from liability for making the report (either by way of civil, criminal or administrative legal proceedings, or contractual or other remedies being sought against them). Further, information they disclose in a report made to a regulator or Commonwealth authority cannot be used in legal proceedings against them (except for proceedings in relation to giving false information). However, they will not be granted immunity from the consequences of any misconduct they have engaged in that is revealed by their report (including, but not limited to, any disciplinary action).

**Who can disclosures be made to under Corporations Act and the Tax Administration Act?**

Protections are available under the Corporations Act (and/or the Tax Administration Act, where relevant) where an eligible Discloser makes a disclosure that is a "disclosable matter" or a "qualifying disclosure" under the Corporations Act (or the Tax Administration Act, where relevant) to the Whistleblowing Officer, a Non-executive Director, or another "eligible recipient" under law, which includes:

- an officer or senior manager of LiveCorp;
- an auditor, or a member of the audit team conducting an audit of LiveCorp;

- an actuary of LiveCorp;
- ASIC, APRA or, in the case of tax-related misconduct, the Australian Taxation Commissioner, or a registered tax agent or BAS agent who provides tax agent or BAS services to LiveCorp; or
- a legal practitioner, for the purpose of obtaining legal advice or legal representation in relation to a report.

In limited circumstances, certain "public interest" or "emergency" disclosures made to journalists or a parliamentarian are also protected by law. It is important that a Discloser understands the criteria for making a “public interest” or “emergency disclosure” before doing so. For example, they must have previously made a disclosure to ASIC, APRA or another prescribed body before they can make a “public interest” or “emergency” disclosure and, in the case of a “public interest” disclosure, at least 90 days must have passed since the previous disclosure. Please contact the Whistleblowing Officer for information in relation to this.

A report must be raised with one of the above people in order to qualify for protection under the Corporations Act (or the Tax Administration Act, where relevant). A Discloser is encouraged to raise a disclosure with the Whistleblowing Officer or a Non-executive Director in the first instance, so that LiveCorp can be in a position to identify and address any wrongdoing as early as possible.

**What should a Discloser do if a protection is breached?**

Where a Discloser believes a protection under law has been breached, they should raise this with the Whistleblowing Officer.

If a person suffers detriment because another person believes or suspects that they or another person has, proposes to make, could make or may make a report that qualifies for protection under the Corporations Act, that person can also seek compensation and other remedies through the courts if they suffer loss, damage or injury because of the disclosure, including if LiveCorp fail to take reasonable precautions and exercise due diligence to prevent the detrimental conduct. A Discloser should seek legal advice if they are considering seeking such remedies.

**Is anything not protected?**

The protections under law (including the Corporations Act) generally do not apply to personal work-related grievances. These are usually reports which relate to a person's employment and solely concerns them personally, which may include a conflict between a person and another employee, or a decision relating to their employment or engagement, such as disciplinary action. Instead, these matters should be reported through the LiveCorp Grievance Procedure and related policies.

However, the protections under law can still apply in some circumstances, such as where a person's report:

- relates to a “disclosable matter” (see above), including a breach of employment or other laws punishable by more than 12 months’ imprisonment;
- has significant implications for LiveCorp;
- relates to any detriment caused or threatened to a person for raising a concern; or
- relates to misconduct beyond the person’s personal circumstances.

Where in doubt, a report should be made to the Whistleblowing Officer or a Non-executive Director. They will make sure the report is dealt with under the right policy.