

Whistleblower Notification Form

Please Read the following information before completing the form:

- 1) If you have reasonable grounds to suspect that a fraud, illegal money laundering, violence or other criminal conduct, or conduct which would cause harm to a person, has taken place (or is taking place or may take place) and that it involves Ledge or any of its officers, employees, contractors, customers or agents, then you should disclose that to Ledge. This list is not exhaustive and other wrongdoing may be covered by this policy even if it may not be a breach of a particular law, for example, if it causes a significant risk to public safety. Further below, we refer to conduct of the kind described in this paragraph as **Wrongful Conduct**.
- 2) A '*personal work-related grievance*' is not Wrongful Conduct justifying a whistleblowing disclosure unless it has significant implications for Ledge that do not relate to you, and:
 - a. concerns conduct (or alleged conduct) referred to in the paragraph above; or
 - b. concerns victimisation or threatened victimisation to you.

A '*personal work-related grievance*' is a complaint or dispute to do with your employment (or previous employment) with Ledge, which has implications for you personally (for example: an interpersonal conflict between you and another employee, or, if you are dissatisfied about a decision relating to your employment such as about transfer or promotion, the terms of your employment, discipline or termination).

- 3) If you do not want to contact Ledge or its Nominated Third Party, you can contact ASIC to make a whistleblowing disclosure, and you should refer to their policies about how the disclosure will be managed and the protections that will be available to you.
- 4) Public interest and emergency disclosures (for example to a member of parliament or journalist) will only be protected if made in specific circumstances set out in the legislation. (For example: before making a public interest disclosure you must first make a report to ASIC, APRA or another prescribed body, and you must wait at least 90 days before making the public interest disclosure. You should ensure you carefully follow the correct process, or your protections under the Corporations Act will be lost).
- 5) An eligible whistleblower may disclose the information to a legal practitioner for the purpose of obtaining legal advice/representation in relation to the operation of the Corporations Act, and this disclosure will be protected under the Corporations Act. It is recommended that you seek legal advice before making a public interest or emergency disclosure.



Complete the Following Form if you believe you have information about likely or actual Wrongful Conduct

Section

<p>1. Do you want to identify yourself</p>	<p>YES <input type="checkbox"/></p> <p><i>Note [1]: even if you identify yourself, your identity will still be kept confidential unless you give the Contact Officer permission to disclose your identity</i></p>	<p>NO <input type="checkbox"/></p> <p><i>Note [2]: you should fill in this form, and check the box for the Nominated Third Party in the section at the end of this form</i></p>
<p>2. If Yes to section 1, what is your full name and preferred contact address?</p>	<p>Enter details for section 2:</p>	
<p>3. If No to section 1, would you like the Contact Officer to send any response to this notification the Nominated Third Party whom you can contact to find out how the investigation is progressing?</p>	<p>YES <input type="checkbox"/></p> <p>What code would you like to use to identify your notification? For example: date + word: 13/02/20Blue</p> <p>Enter notifier code:</p> <p>_____</p> <p><i>Note [3]: you may access information about the investigation of your notification by contacting the [Nominated Third Party] and referring to this code word.</i></p>	<p>NO <input type="checkbox"/></p> <p><i>Note [4]: if you answer no, we will not be able to contact you and will only act on the information we can obtain from your notification and other sources.</i></p>
<p>4. Are you:</p> <ul style="list-style-type: none"> a. an officer or employee of Ledge; b. a supplier of goods or services to Ledge (including on an unpaid basis), or an employee of such a supplier; c. a director or secretary of a related body corporate of Ledge; or d. a relative or dependant of any of the above people. 	<p>YES <input type="checkbox"/></p> <p>If yes, which of the listed persons are you?</p> <p>Enter details for section 4:</p>	<p>NO <input type="checkbox"/></p> <p>If no, you may still make this notification, but you will not be entitled to the protection as a whistleblower.</p>



	<p><i>Note [5] if you are making an anonymous notification, you need not complete any further details in this section after checking YES.</i></p>	
<p>5. What Wrongful Conduct or likely Wrongful Conduct are you concerned about?</p>	<p><i>Enter details for section 5:</i></p> <p><i>Note [6]: examples of Wrongful Conduct include fraud, illegal money laundering, violence or other criminal conduct, or conduct which would cause harm to a person or has caused or may cause a significant risk to public safety.</i></p>	
<p>6. When and where did the Wrongful Conduct occur (dates and times or approximate dates and times if you aren't sure)?</p>	<p><i>Enter details for section 6:</i></p>	
<p>7. Name those participating in the Wrongful Conduct and identify the actual role each person played</p>	<p><i>Enter details for section 7:</i></p>	
<p>8. Please attach scanned copies of any documents, file notes, emails, photographs that support your notification, or, if you know of a document that would contain such information, but you don't have it, describe that document</p>	<p><i>Enter details for section 8:</i></p>	

SUBMIT FORM TO:

To submit this form, you can either:

- i) save it as a file and email it to one of the contacts below; or
- ii) print and mail it to one of the contacts below.

Please note that if you would like your notification to be treated as an anonymous notification, you need to ensure you do not identify yourself in Sections 1 and 2 and you send your form to the nominated third party.



Name & Position	Contact address:	Telephone	Email
Noel Smith, DRC	Level 2, Suite 16, 420 Bagot Road, Subiaco, WA 6008	08 6318 2777	noel@ledge.com.au
Name & Position	Contact address:	Telephone	Email
Tony Del Popolo	Level 2, Suite 16, 420 Bagot Road, Subiaco, WA 6008	08 6318 2777	tony@ledge.com.au
For Anonymous Notifications you must send this form to the Nominated Third Party	Contact address:	Telephone	Email
Vic Letizia	1/544 Beaufort St, Mount Lawley WA 6050	08 9227 6444	vic@letiziapalmer.com.au

What happens next?

An investigation will only take place if there is objective evidence to support the allegations, or, a reasonable suspicion that such evidence may be obtained through further investigation.

The investigator appointed by Ledge will determine whether the information in the disclosure is proven on the balance of probabilities (i.e. it is more likely than not that the alleged conduct has occurred).

A formal investigation might involve third parties such as lawyers, accountants, consultants or specialist forensic investigators. Relevant evidence will be collected, which may include interviewing witnesses. The investigator will endeavour to complete the investigation within six weeks, but this will depend on the circumstances and nature of your disclosure

If a whistleblowing disclosure is proven, the investigator will report the outcome of the investigation to the appropriate decision-maker for further action. Where appropriate, the whistleblower will be advised of the outcome, provided that the whistleblowing disclosure was not made anonymously and relevant contact details have been provided.

If the whistleblowing disclosures are not proven, but there is evidence of other inappropriate conduct, then matter may be referred for other action.