

2 Cheap Cars Group Limited – Whistleblower (Protected Disclosures) Policy

1. Purpose

- 1.1 2 Cheap Cars wants to promote high ethical standards in the way we work. The purpose of this policy is to allow for the proper disclosure and investigation of serious wrongdoing within 2 Cheap Cars and protect our people who make disclosures in accordance with the Protected Disclosures (Protection of Whistleblowers) Act 2022 (Act).
- 1.2 This policy does not provide an avenue through which our people can raise concerns with the regular business activities of 2 Cheap Cars or employment relations (such as conduct and performance issues).

2. Application

- 2.1 This policy applies to all disclosers (as defined below) in relation to 2 Cheap Cars and its subsidiaries (together, 2 Cheap Cars for the purposes of this policy). A **discloser** is any individual who is, or was formerly:

- 2.1.1 An employee.
- 2.1.2 a homemaker;
- 2.1.3 a secondee;
- 2.1.4 an independent contractor;
- 2.1.5 an individual concerned in management (for example, a member of the board); or
- 2.1.6 a volunteer

of 2 Cheap Cars

- 2.2 This policy and its application are at 2 Cheap Cars' absolute discretion. This policy may be varied, rescinded or replaced from time to time and may not be applied by 2 Cheap Cars in every situation (subject to 2 Cheap Cars complying with its statutory obligations).

3. What is a protected disclosure?

- 3.1 A disclosure of information is a **protected disclosure** if the discloser:
 - 3.1.1 believes on reasonable grounds that there is, or has been, serious wrongdoing in or by 2 Cheap Cars;
 - 3.1.2 discloses information in accordance with the Act; and
 - 3.1.3 does not make the disclosure of information in bad faith
- 3.2 **Serious wrongdoing** includes any act, omission, or course of conduct that is:
 - 3.2.1 an offence;
 - 3.2.2 a serious risk to public health, public safety, the health or safety of any individual, or the environment;
 - 3.2.3 a serious risk to the maintenance of law, including the prevention, investigation and detection of offences, or the right to a fair trial;

4. **How can a protected disclosure be made?**

- 4.1 A discloser can report serious wrongdoing to 2 Cheap Cars' CEO or CFO
- 4.2 A discloser may also report serious wrongdoing to an appropriate authority at any time (whether or not they have also made the disclosure to 2 Cheap Cars). An appropriate authority includes:
 - 4.2.1 the head of any public sector organisation;
 - 4.2.2 any officer of Parliament (but not a Minister or member of Parliament); and
 - 4.2.3 the persons or bodies listed in Schedule 2 of the Act.
- 4.3 An appropriate authority may decide to refer the disclosure to 2 Cheap Cars or to another appropriate authority (in which case, the discloser will be consulted first).

5. **How will a discloser be protected?**

- 5.1 Any person who makes a protected disclosure in accordance with this Policy, or discloses information in support of another person's protected disclosure, is entitled to the following protections:
 - 5.1.1 confidentiality of identity (unless the discloser consents to releasing their identity or an exception under the Act applies);
 - 5.1.2 protection from retaliation in the discloser's employment (for example, termination of employment or subjecting the employee to disadvantage in their employment); and
 - 5.1.3 protection from victimisation.
- 5.2 The above protections will apply even if the discloser
 - 5.2.1 is mistaken about the serious wrongdoing;
 - 5.2.2 does not refer to the Act when making the protected disclosure;
 - 5.2.3 technically fails to comply with the Act; or
 - 5.2.4 makes the disclosure to another person, if they did so on a confidential basis and for the purposes of seeking advice about whether and how to make a protected disclosure under the Act.

The above protections will not apply if a disclosure is made in bad faith. 2 Cheap Cars may take disciplinary action against an employee who makes a disclosure in bad faith

6. **How will 2 Cheap Cars deal with protected disclosures?**

- 6.1 If 2 Cheap Cars receives a protected disclosure in accordance with this policy, it will within 20 working days of receipt:
 - 6.1.1 acknowledge the date the disclosure was received (and, if the disclosure was made orally, summarise their understanding of the disclosure);
 - 6.1.2 consider the disclosure and whether it warrants investigation;
 - 6.1.3 check with the discloser whether the disclosure has been made elsewhere (and any outcome);

- 6.1.4 deal with the matter by:
 - a) investigating the disclosure;
 - b) addressing any serious wrongdoing by acting or recommending any action;
 - c) referring the disclosure to an appropriate authority (in which case, the discloser will be consulted first); and/or
 - d) deciding that no action is required (in which case, the discloser will be informed with reasons); and
- 6.1.5 inform the discloser (with reasons) about what has been done, or is being done, to deal with the matter.
- 6.2 If 2 Cheap Cars cannot complete the above actions within 20 working days, it will follow steps 1 to 3 within 20 working days and then:
 - 6.2.1 inform the discloser the expected length of time to deal with the matter;
 - 6.2.2 appropriately update the discloser about progress;
 - 6.2.3 deal with the matter by taking one of the steps described in 4 above; and
 - 6.2.4 inform the discloser (with reasons) about what has been done, or is being done, to deal with the matter.

Date Approved: November 2023