

# Plenary Group Holdings Pty Ltd

## Whistleblower Policy

November 2025

### About this policy

Plenary Group Holdings Pty Ltd (**Plenary**) is committed to the highest standards of ethical conduct and behaviour in all its business activities and aims to foster a culture where its employees and stakeholders feel safe to speak up in relation to possible wrongdoing. The purpose of this policy is to help deter wrongdoing in line with our values and our risk management and governance framework. This policy also ensures that Plenary complies with the whistleblower protections included in the *Corporations Act 2001* (Cth) (“**the Corporations Act**”) as well the relevant legislation for its subsidiaries in other jurisdictions

This policy clarifies for the benefit of all Plenary employees and stakeholders:

- that Plenary encourages people to raise a concern about any perceived misconduct within the business;
- how to express their concerns;
- what to expect when they express their concerns; and
- to feel safe to speak up.

### Application

This policy applies to all Plenary staff, stakeholders and members of the community eligible to make a disclosure in relation to Plenary, its related body corporates, any project vehicles in which Plenary has an equity investment or finance vehicles set up as part of the project structure.

Version	Owner
November 2025 [Active Version #5]	Head of Legal

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# 1 Scope

## 1.1 Purpose

This policy applies to the following disclosers:

- all current and former Plenary employees, whether full-time, part-time or casual, at any level of seniority and independent of their location of employment;
- all broader stakeholders of Plenary, such as current and former officers, contractors, brokers, auditors, advisers, consultants, suppliers of goods or services;
- relatives, dependants or spouses of the individuals listed above; and
- parties who have a relationship to Plenary that is relevant to its tax affairs (for Tax related disclosures).

## 2 Definitions

Within this Policy:

Table 1 – Policy definitions

Term	Definition
<b>Tax related disclosures</b>	Disclosures qualifying for protection under the <i>Taxation Administration Act 1953</i> (Cth), where the discloser has reasonable grounds to suspect that the information indicates misconduct or an improper state of affairs or circumstances in relation to the tax affairs of Plenary.
<b>Whistleblowing</b>	The raising of concerns about perceived, potential, suspected or actual misconduct within Plenary, its related body corporates or any project vehicles in which Plenary has an equity investment or finance vehicles set up as part of the project structure, which is a key element of promoting corporate compliance and strong corporate governance.

## 3 Policy

### 3.1 What can be disclosed as reportable conduct?

#### 3.1.1 Reportable Conduct

Disclosers, who have actual knowledge or reasonable grounds to perceive or suspect any conduct, practice or activity in relation to Plenary, or its related body corporates, that is:

- dishonest or unethical;
- misconduct, or an improper state of affairs;
- fraudulent, corrupt, financial malpractice, bribery or illegal;
- a failure to comply with, or breach of, legal or regulatory requirements; or
- represents a danger to the public or the financial system

can disclose this as a disclosable matter.

'Reasonable Grounds' means that a reasonable person in your position would also suspect the information indicates misconduct or a breach of the law.

In addition to the above, this reportable conduct will be a protected disclosure under the relevant legislation of the jurisdiction where the contravention takes place.

### 3.1.2 Conduct that is not reportable

Personal work-related grievances such as interpersonal conflicts, grievances in relation to a transfer, promotion or disciplinary decisions that only affect the discloser personally but do not have any other significant implications for Plenary or relate to any conduct about a disclosable matter, do not fall under this policy. Personal work-related grievances do not qualify for protection Plenary's responsibility in relation to these grievances is regulated by our [Work Health & Safety Policy](#).

## 3.2 How and to whom disclosures can be made

Concerns can be raised either formally or informally depending on your circumstances and the seriousness of the disclosable matter.

Employees, in the first instance, are encouraged to raise any concerns regarding any perceived or actual wrongdoing internally with their senior manager or their local People & Culture Business Partner. This will allow Plenary to address any potential wrongdoing as early as possible.

Plenary acknowledges that there may be matters you do not feel comfortable raising with your senior manager/People & Culture Business Partner or you may feel that any matters previously raised have not been adequately addressed. In that case you can make an internal (3.2.1) or external (3.2.2) disclosure.

### 3.2.1 Making a Disclosure Internally

You have the option to make disclosures to 'eligible recipients', such disclosure will qualify for protection. Eligible Recipients are any member of the executive team or any PGH board member. For subsidiaries located in other jurisdictions, protected disclosures can be made to the board members or CEO of the local subsidiary.

### 3.2.2 Making a Disclosure Externally

In case you do not feel comfortable making an internal disclosure, you can make a disclosure directly to our third-party Whistleblower Service SpeakUp.

Plenary SpeakUp allows web reporting and phone reporting in your local language.

Access Plenary SpeakUp at <https://plenary.speakup.report/raiseaconcern> to lodge a report via the web or to find the phone number for your location.

You can identify yourself or remain anonymous when you make a report to Plenary SpeakUp. If you choose to provide your email address to SpeakUp, your anonymity will be retained as SpeakUp does not share your email address with Plenary. Anonymous disclosers will have the same protections as disclosers who share their identity, but anonymity does limit the ability of Plenary to investigate the matter.

After it receives a disclosure, Plenary SpeakUp will allow for appropriate case management by the nominated recipients within Plenary or its related body corporates, dependent on the nature of the disclosure.

You can also make disclosures directly to external parties (depending on which jurisdictions your disclosure relates to) according to the relevant applicable legislation.

In Australia *the Corporations Act* and the *Taxation Administration Act* (for Tax related disclosures) allow you to make your disclosure to external parties, in the knowledge that you will have access to the same protections as set out in this Policy.

The ADGM Whistleblower Protection Regulations 2024 allow you to make protected disclosures regarding ADGM entities, directly to specified authorities (the Registration Authority, the Financial Services Regulatory Authority and the ADGM Office of Data Protection and law enforcement agencies in the UAE).

We recommend the discloser checks the local applicable legislation if they would prefer to make their disclosure directly to external parties.

### 3.2.3 Disclosure

Plenary encourages you to disclose as much information as possible, including details of the misconduct, people involved, dates, location and any other available evidence.

Plenary expects whistleblowers making a disclosure under the policy to act honestly, genuinely and in good faith. In case a disclosure made in good faith turns out to be incorrect, the discloser still qualifies for protection.

If, after investigation, it is determined that the disclosure was made for a malicious purpose, Plenary reserves its right to take appropriate action.

#### **When is a Report a Protected Disclosure?**

For a report to be a Protected Disclosure under this policy, the person disclosing must be an Eligible Person who:

1. reports conduct that is Reportable Conduct; and
2. reports based on Reasonable Grounds; and
3. makes the report in accordance with this policy to an Eligible Recipient (see section 3.2.1 and 3.2.2).

Protected Disclosure is not available to persons who are themselves involved in Reportable Matters, even where they have made the disclosure.

## 3.3 After a disclosure is made

### 3.3.1 Protections for disclosers

Plenary is committed to providing disclosers, irrespective of whether the disclosure is made internally or externally, with support and protection from any reprisal or personal or financial disadvantage where the disclosers have acted in good faith and on reasonable grounds.

Plenary will also take reasonable steps to ensure that information likely to lead to your identification is not disclosed without your consent. To ensure confidentiality of the discloser's identity (to the extent permitted by law), Plenary will refer to the discloser in a gender-neutral context and limit access to all information in relation to the discloser to those directly involved in managing and investigating the disclosure.

Plenary will act in the best interest of a discloser to protect them from any detrimental treatment (such as dismissal, demotion, harassment, discrimination, harm or injury or other unfavourable treatment connected with making a disclosure) by taking relevant actions to protect a discloser from risk of detriment (e.g. through monitoring and managing the behaviour of other employees, assigning a Whistleblower Protection Officer where necessary). Plenary is committed to acting in fairness in all matters raised under this policy.

Detrimental conduct does not include reasonable administrative actions and managing disclosers' unsatisfactory work performance.

## **Other Protections**

You will be protected from civil, criminal and administrative liability in relation to a Protected Disclosure. You can still qualify for the protections under this Policy even if the disclosure turns out to be incorrect or if your legal practitioner has advised you that the disclosure is not a Reportable Matter. However, this Policy will not protect the discloser if they are also involved in or connected to the improper conduct or illegal activities that are being reported.

A discloser who has made a Protected Disclosure must at all times, during the reporting process and any resulting investigation process, continue to comply with this Policy.

### **3.3.2 Assessment of a disclosure**

All disclosures will be assessed and considered by Plenary and a decision will be made as to whether these disclosures should be investigated in accordance with this Policy.

Decisions regarding response and investigation methods will be made in consideration of potential risks to disclosers' confidentiality and detriment, and suitable measures will be considered and implemented to mitigate these risks as required.

### **3.3.3 Investigations**

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

Without the discloser's consent, Plenary cannot disclose information that is likely to lead to the discloser's identification unless it is reasonably necessary for investigating the issues raised in the disclosure.

Any disclosures raised under this policy will be treated seriously and with sensitivity and will be dealt with fairly and objectively, including any appropriate legal protections. Anyone who is the subject of a disclosure will also be treated seriously, with sensitivity and be dealt with fairly and objectively, including any appropriate legal protections.

The discloser will be advised of the decisions whether to investigate the reportable conduct or not, unless the report has been made anonymously and Plenary has no means of contacting the discloser.

#### **Investigation process**

Investigations will be conducted in a fair manner, without bias and as efficiently as is practicable.

If appropriate, Plenary will appoint a Whistleblower Investigation Officer to lead an investigation into the disclosed matter. Provided there are no restrictions or another reasonable basis for not doing so, persons against whom an allegation has been made will be informed of the allegation and will have an opportunity to respond to the allegation.

Plenary may engage the services of independent investigators as required and appropriate.

Where Plenary investigates internally, it will ensure there is no conflict of interest between the Plenary staff reviewing the incident and the discloser.

The Whistleblower Investigation Officer will provide the discloser with feedback on the progress and expected timeframes of the investigation, as appropriate.

#### **Investigation findings**

At the end of the investigation, the Whistleblower Investigation Officer must submit a report to the Head of Legal, which will be the property of Plenary and will remain confidential. The report will include findings on the disclosure and an overview of the evidence on which the findings are based.

On the basis of the investigation and the report, Plenary may decide to take appropriate action, which may include:

- provision of a satisfactory explanation in relation to the matter;
- resolution of the matter, recording of the outcome and ongoing monitoring; or
- external reporting of the conduct, with potential for external investigations,

or a combination of the above.

If required, protected disclosures, can be escalated to the relevant authorities as allowed per the relevant local legislation.

The discloser will receive feedback on the outcome, to the extent they have made any means to be contacted available to Plenary.

## 4 Policy Governance

All Plenary policies are created and maintained in Plenary’s online Policy Management platform, to facilitate centralised and effective governance and oversight by Plenary Boards and Executive.

The “Document Administration” function is managed by Plenary Legal.

### 4.1 Policy Distribution

This policy is available on Plenary’s website and has been made available to all Plenary employees and officers via the intranet ([Intranet](#)) .

The management of policy content on [www.plenary.com](http://www.plenary.com) is selected and reviewed by the Executive Director, Communications and Community for public statement in consult with the Document Owner.

### 4.2 Related Documents

This policy is supported by the following related documents:

Table 2 - Table Caption

Document Type	Name	Location/link
Corporate Policy (internal)	Work Health & Safety Policy	<a href="#">Work Health and Safety Policy</a>

### 4.3 Policy Review

Table 3 - Table Caption

Document Information	Detail
Active Document Version number	4.0
Document Review frequency	Every two years

Document Information	Detail
Last formal review or revision update	24/11/2025