

**Future Super**

**Whistleblowing Policy**

**Approved 27 September 2021**

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## 1. Introduction

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### 1.1 Objective

This Whistleblowing Policy is designed to support the commitment of the Future Superannuation Group Pty Ltd, a corporate group consisting of several subsidiaries (together referred to in this document as **Future Super**)<sup>1</sup>, to openness and accountability. This Policy is underpinned by our commitment to promote a culture and workplace environment that supports the physical and psychological health and wellbeing of our Representatives in the workplace, and the way that they interact with our members and clients.

The Policy sets out the system for reporting, investigating and handling wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing the wrongdoing, and articulates how such reports will be dealt with fairly, confidentially and impartially by Future Super. By reporting wrongdoing, you can ensure people are secure and safe in our work environment and help us detect fraud and misconduct. This enables us to reinforce a consistent culture of proactive risk management and strong corporate governance that our people, members and regulators can rely upon.

The Policy also provides clarity on how Future Super supports Reporters so that they:

- Are encouraged to express their concerns;
- Know how to express their concerns;
- Know what will happen when they express their concerns; and
- Feel supported and protected in expressing their concerns.

Future Super values an open and transparent environment for reporting wrongdoing. Future Super will treat each and every report received as serious and will take all reasonable steps to protect and support the Reporter. Future Super will not tolerate detrimental treatment of any person who has made, or is considering making, a report under this Policy.

### 1.2 Application

This Policy applies to all Directors, Committee members, Employees and Eligible Whistleblowers (together **Reporters**) as defined in section 1.4 below.

This Policy is not suitable for:

- Members of the Super Fund<sup>2</sup> who have complaints or objections regarding the operation of the Super Fund** – these issues should be raised in accordance with the Trustee’s complaints handling procedures.
- Customers of Future Super who have complaints or objections regarding the service they have received from Future Super or a Future Super Representative** – these issues should be raised in accordance with the procedures outlined in our **Complaints Handling Procedures**.
- Contractors and service providers who are in dispute with Future Super over compliance with the terms of their contracts** – such disputes should be raised with accordance with the procedures outlined in the relevant service agreement or engagement letter.

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<sup>1</sup> **Future Super** is the term used to when making a generic reference to the Future Superannuation Group Pty Ltd (**FSG**) and each of its wholly owned subsidiaries: Future Superannuation Holdings Pty Ltd (**FSH**), Future Super Investment Services Pty Ltd (**FSIS**) and Future Super Services Pty Ltd (**FSS**).

<sup>2</sup> **Super Fund** is the term used to refer to the Future Superannuation Fund, in which there are two sub-plans – Future Super and Verve Super.

- d. **Personal work-related grievances held by Future Super Representatives (such as an interpersonal conflict with a colleague), which do not otherwise relate to detriment or threat of detriment to the Reporter** – these should be dealt with by the Chair of the FSG (Group) Board (complaints from Directors) or Senior Leadership Team (complaints from employees).

Note: Sometimes there are personal work-related grievances which do qualify as protected disclosures. For example, where they are part of a problematic pattern or systemic issue within Future Super, or if the grievance is bundled with illegal activity or other Reportable Conduct.

## 1.3 References

The content of this Policy has been written to align with the obligations contained in *ASIC Regulatory Guide 270 – Whistleblower Policies (November 2019)*, *ASIC Information Sheet 238 - Whistleblower Rights and Protections (July 2019)* and *ASIC Information Sheet 239 - How ASIC Handles Whistleblower Reports (July 2019)*, which in turn reference the whistleblower protection provisions which apply to all companies registered under Part 9.4AAA of the *Corporations Act 2001*.

There are also specific protections provided in the tax whistleblower regime as outlined in Part IVD of the *Taxation Administration Act 1953*. Whilst these provisions are not specifically referenced in this Policy, reports received which include a tax element will be considered with reference to the provisions.

Future Super notes that whilst it falls outside the definition of the types of entities that are required to have a corporate whistleblower policy which complies with the statutory requirements set out in Part 9.4AAA of the *Corporations Act 2001* – being public companies, large proprietary companies and trustees of a registrable superannuation entity<sup>3</sup> – it has chosen to comply where practicable with the statutory requirements as a matter of better governance practice.

This Policy should be read with reference to Future Super's **Conflicts Management Procedures, Complaints Handling Procedures** and **Privacy Policy**.

## 1.4 Definitions

The following definitions are important to this Policy:

- a. **Disclosable Matters** – to qualify for protection as a whistleblower under the *Corporations Act 2001* (see section 3.4 below) the Reporter must disclose that he or she has reasonable grounds to suspect<sup>4</sup>:
- i. Misconduct<sup>5</sup>, or an improper state of affairs or circumstances, in relation to an entity or, if the entity is a body corporate, a related body corporate of the entity; or
  - ii. That an entity (including its officers and employees) has engaged in conduct which:
    - A. Constitutes an offence against, or a contravention of, a provision of any of the following: the Corporations Act, the ASIC Act, the Banking Act, the Financial Section (Collection of Data) Act, the Insurance Act, the Life Insurance Act, the National Consumer Credit Provision Act, the SIS Act, or an instrument made under one of the above Acts;
    - B. Constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;

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<sup>3</sup> See section 1317AI of the *Corporations Act 2001*.

<sup>4</sup> **Reasonable grounds to suspect** is based on the objective reasonableness of the reasons for the Reporter's suspicion. It ensures that a Reporter's motive for making a disclosure, or their personal opinion of the person(s) involved, does not prevent them from qualifying for protection.

<sup>5</sup> **Misconduct** is defined in s.9 of the *Corporations Act 2001* to include fraud, negligence, default, breach of trust and breach of duty.

- C. Represents a significant risk to public safety or the stability of, or confidence in, the financial system ; or
- D. Is prescribed by legislation.
- b. **Eligible Recipient** – the individuals authorised to receive a report on Reportable Conduct by an Eligible Whistleblower in respect of Future Super, specifically:
- A current Officer of Future Super, including the Directors of the FSG Board, the members of the FSG Risk Committee, and the members of the Senior Management Team.
  - A member of the audit team of the Internal Auditor appointed by Future Super
  - A member of the audit team of the External Auditor appointed by Future Super
  - Any person authorised by Future Super to receive reports
  - A regulator of Future Super (ASIC, AUSTRAC or the ATO)
  - Your Call (under an engagement with Future Super to provide an external whistleblowing hotline).
- c. **Eligible Whistleblower** – a current or former:
- Officer of Future Super;
  - Employee of Future Super;
  - Service provider or supplier (or officer or employee of the service provider or supplier) to Future Super;
  - Trustee, Custodian or Investment Manager of the Future Superannuation Fund (or officer or employee of the Trustee, Custodian or Investment Manager);
  - Service provider or supplier (or officer or employee of the service provider or supplier) to the Trustee, Custodian or Investment Manager; and
  - Associate or family member (spouse, relative or dependant) of one of the above.
- d. **Employee** – a current or former permanent, part-time, casual employee of, or contractor to, Future Super (together with Officers, known as **Future Super Representatives**).
- e. **Reporter** – an individual who meets the definition of an Eligible Whistleblower, who reports Reportable Conduct that is occurring or has occurred within Future Super in accordance with this Policy.
- f. **Reportable Conduct** – conduct by a person or persons connected to Future Super which the Reporter has reasonable grounds to believe<sup>6</sup>, is:
- i. Seriously harmful or potentially seriously harmful to a Future Super Representative (e.g., deliberate unsafe work practices with wilful disregard to the safety of others).
  - ii. Unethical (e.g., acting dishonestly, wilfully making false entries in or altering company records, knowingly and wilfully breaching Group policies, including the Code of Conduct).
  - iii. Potentially damaging to Future Super (e.g., gross mismanagement of assets, serious or substantial waste of company resources, or repeated breaches of administrative procedures).
  - iv. Fraudulent or corrupt (including misuse of a person’s position for personal gain).
  - v. A contravention of any law that applies to Future Super, including (but not limited to) the *Corporations Act 2001*, the *ASIC Act*, the *Superannuation Industry (Supervision) Act 1993*, as well as any associated instruments;
- i. A criminal offence (including theft, drug sale/use, discrimination, harassment, violence or threatened violence and criminal damage against property).
  - ii. Any other conduct which may cause financial or non-financial loss to Future Super or be otherwise detrimental to the interests of Future Super or any of its Representatives, or damage its reputation.

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<sup>6</sup> See section 1317AA(4) of the *Corporations Act 2001*.

- iii. Deliberate concealment of any of the above.
  - iv. Involves any other kind of serious impropriety including retaliatory action against a Reporter for having disclosed Reportable Conduct.
  - v. A Disclosable Matter.
- g. **Officer** – a current or former director or company secretary of the FSG Board or one or more of the subsidiary boards (together with Employees, known as **Future Super Representatives**).
- h. **Protection Officer** – the person/s appointed by Future Super to provide protection to a Reporter against being personally disadvantaged. They will act impartially without any preconceived opinion on the Reporter or the subject matter, or any conflict of interest. The Protection Officer operates independently of the Whistleblower Officer. The nominated Protection Officers are the CPO and the Human Resources Coordinator.
- i. **Trustee** – the trustee of the Future Superannuation Fund.
- j. **Whistleblower Officer** – the persons appointed by Future Super to manage all reports of Reportable Conduct received in accordance with this Policy. They will operate independently of the Protection Officer. The nominated Whistleblower Officers are the CPO and the ComSec.
- k. **Your Call** – the provider of an external whistleblowing hotline engaged by Future Super.

## 1.5 Awareness and Understanding

A copy of this Policy is made available to all Future Super Representatives on a shared drive. If material changes are made to this Policy these changes are communicated to all Future Super Representatives by the most appropriate means in the given circumstances, and a copy of the revised document is made available.

An introduction to this Policy will be provided to all Future Super Representatives during induction, and refresher training will be conducted on a regular basis.

Future Super Representatives are able to seek confidential information on the operation of this Policy, how a disclosure can be made and will be handled, and the support and protection available by contacting the Protection Officer or Your Call. In the event that a formal disclosure is not made, Future Super may still be compelled to act on the information provided during the discussion, if the information reasonably suggests that misconduct has occurred or may occur.

Persistent and conscious failure by a Future Super Representative to act in accordance with this Policy is considered a serious disciplinary matter and corrective action will be determined by Future Super on a case-by-case basis.

## 1.6 Review

The Policy is reviewed biennially.

An ad hoc review may be triggered outside of the biennial review timetable:

- a. If there is a significant change to the size, business mix, or complexity of Future Super's business operations;
- b. If there is a significant change in relevant legislation, regulatory requirements or prudential standards and guidance; or
- c. At any other time on the request of the FSG Risk Committee or the FSG Board.

The findings of any review, and the action taken and/or planned to address issues identified in the review process, will be reported to the FSG Risk Committee.

## 2. Making a Report

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### 2.1 Overview

To facilitate investigations of Reportable Conduct, Future Super would prefer that a Reporter makes a report openly and discloses their identity. However, it is understood that any person who has reasonable grounds to suspect that Reportable Conduct has occurred and is apprehensive about raising their concern because of the fear of possible adverse repercussions, can make a report anonymously.

A Reporter considering making a report must have reasonable grounds for believing the disclosure is Reportable Conduct. A Reporter will be given the opportunity to provide evidence in relation to the Reportable Conduct, but is not required to prove their allegations.

This Policy is intended to apply to Reportable Conduct which is serious in nature. Unsubstantiated reports that are trivial, vexatious, made maliciously or known to be false will be viewed seriously and may be subject to disciplinary action.

### 2.2 Internal Reporting Avenues

A disclosure of Reportable Conduct can be made to any Eligible Recipient (see section 1.4(b) above).

Reporters are encouraged to make a report in person or by phone or email to a member of the Senior Management Team.

### 2.3 External Reporting Avenues

External reporting avenues are:

- A member of the audit team of the External Auditor appointed by Future Super
- A regulator of Future Super (ASIC, AUSTRAC or the ATO)
- Your Call
- A legal practitioner
- A public interest disclosure
- An emergency disclosure

#### Your Call

Your Call provides an anonymous and secure whistleblower service. Making a report to Your Call allows the Reporter to remain completely anonymous, to identify themselves only to Your Call, or to identify themselves to both Your Call and Future Super.

Your Call contact options:

- Website: [www.yourcall.com.au/report](http://www.yourcall.com.au/report) – enter code FSS.
- Phone: 1300 790 228 (9am – 12am AEST on recognised business days)
- Email: [FSS@yourcall.com.au](mailto:FSS@yourcall.com.au)
- National Relay Service (if hearing impaired or suffering from a speech impediment): Choose a contact method at [www.relayservice.gov.au](http://www.relayservice.gov.au) and request Your Call's hotline 1300 790 228.
- Translating and Interpreting Service (if speaking or understanding English is difficult): Contact 131 450 and request Your Call's hotline 1300 790 228.

After making a disclosure to Your Call, the Reporter will be provided with a unique Disclosure Identification Number (**DIN**) and access to a secure online Message Board. The Message Board allows ongoing anonymous communication with Your Call and/or Future Super. Your Call remains the intermediary at all times, receiving and forwarding communication between all parties. The Message Board can be used to receive

updates, share further information/evidence and request support or report retaliation. If the Message Board cannot be accessed, Your Call will provide verbal updates by phone.

## A Legal Practitioner

Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act are protected (even in the event that the legal practitioner concludes that a disclosure does not relate to a Disclosable Matter).<sup>7</sup>

## Public Interest Disclosure<sup>8</sup>

A public interest disclosure can be made to a journalist or a member of Parliament if:

- a. The Reporter has made a report to a regulator of Future Super;
- b. At least 90 days has passed since this report was made and the Reporter has reasonable grounds to believe that no action has or will be taken in relation to their disclosure;
- c. The Reporter has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- d. The Reporter has given written notice to the regulator who received the initial report that includes sufficient information to identify the previous disclosure and states their intention to make a public interest disclosure.

Reporters are strongly encouraged to contact an independent legal adviser before making a public interest disclosure.

## Emergency Disclosure<sup>9</sup>

An emergency disclosure can be made to a journalist or a member of Parliament, provided that:

- a. The Reporter has made a report to a regulator of Future Super;
- b. The Reporter has reasonable grounds to believe that their report concerns a substantial and imminent danger to the health or safety of one or more people or to the natural environment;
- c. The Reporter has given written notice to the regulator who received the initial report that includes sufficient information to identify the previous disclosure and states their intention to make an emergency disclosure; and
- d. The extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or member of Parliament of the substantial and imminent danger.

Reporters are strongly encouraged to contact an independent legal adviser before making an emergency disclosure.

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<sup>7</sup> See s.1317AA(3) of the *Corporations Act 2001*.

<sup>8</sup> Before making such a disclosure, Reporters are strongly encouraged to seek independent legal advice to understand the criteria under which such disclosures can be made.

<sup>9</sup> Before making such a disclosure, Reporters are strongly encouraged to seek independent legal advice to understand the criteria under which such disclosures can be made.

## 2.4 Content of the Report

The report must be made in writing (email is sufficient) and addressed to the chosen Eligible Recipient. It must also indicate whether the Reporter wishes their identity to remain confidential.

The report must provide as much detail as possible regarding the Reportable Conduct. As a minimum it should provide:

- a. An explanation of the Reportable Conduct;
- b. The names of any persons involved in the Reportable Conduct;
- c. The names of any persons who witnessed the Reportable Conduct;
- d. Dates, times and locations of when the Reportable Conduct was observed;
- e. Specific details of any transactions involved; and
- f. Any other details of the Reportable Conduct, including evidence in the form of documents or emails, and information about financial or non-financial loss.

## 3. Whistleblower Protection and Support

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### 3.1 Consent and Confidentiality

All disclosures of Reportable Conduct by a Reporter will be treated in the strictest of confidence and all reasonable steps will be taken to protect the identity of the Reporter.

A Reporter can choose to remain anonymous while making a report, over the course of the investigation and after the investigation is finalised. A Reporter can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. Future Super strongly encourages a Reporter who wishes to remain anonymous to maintain ongoing, anonymous communication with Future Super to allow follow-up questions to be asked.

The Reporter must generally provide their consent before any information can be shared or discussed as part of the investigation into their report.

The content of the report will not be discussed with anyone without the Reporter's consent (exceptions apply<sup>10</sup>), other than those who need-to-know for the purposes of investigating the issues raised in the report, and all reasonable steps will be taken to protect the identity of the Reporter (unless the Reporter provides consent in writing for their identity to be revealed). This also includes taking reasonable precautions to ensure that any reported disclosures (physical or electronic) are stored securely with restricted access by authorised personnel only.

Unauthorised disclosure of information relating to a report or of the identity of the Reporter will be regarded seriously and may result in disciplinary action. Civil and criminal penalties under the Corporations Act may also apply.

### 3.2 Exceptions to Consent and Confidentiality

Information about a Reporter's identity or information that is likely to lead to the identification of a Reporter, may only be disclosed in the following circumstances:

- a. Where the information is disclosed to APRA or ASIC or a member of the Australian Federal Police;
- b. Where the information is disclosed to a legal practitioner for the purpose of obtaining legal advice for Future Super in respect of the operation of applicable whistleblowing protection laws; or
- c. Where the Reporter consents to the disclosure.

Information contained in a report can be disclosed without the Reporter's consent provided that:

- a. The information does not include the Reporter's identity;
- b. All reasonable steps have been taken to reduce the risk that the Reporter will be identified from the information (i.e. by removing possible identifying details); and
- c. The information is reasonably necessary to allow for investigation of the issues raised in the report.

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<sup>10</sup> A person or entity can disclose information contained in a report without the Reporter's consent if:

- (a) the information does not include the Reporter's identity;
- (b) the person or entity has taken all reasonable steps to reduce the risk that the Reporter will be identified from the information; and
- (c) it is reasonably necessary for investigating the issues raised in the report.

### 3.3 General Protections

Disclosures of Reportable Conduct may be protected by law and Future Super will strive to ensure confidentiality in the investigation and the protection of the Reporter's identity.

The types of protection that Future Super will make available will depend on the situation but may include:

- a. Monitoring and managing the behaviour of other Future Super Representatives who are related to the Reportable Conduct.
- b. Offering a paid leave of absence or flexible working arrangements while the conduct is investigated.
- c. Rectification of any detriment the Reporter may have suffered as a result of the report/investigation.

We will look for ways to support all Reporters, but we will not be able to provide non-employees with the same type and level of support that we can provide to employees (for example, because we cannot offer flexible workplace arrangements to a supplier). In such cases, we will still seek to offer as much support as practicable.

A Reporter who has reasonable grounds to believe that there is Reportable Conduct, and who has not engaged in the Reportable Conduct, should not be subject to any form of personal disadvantage resulting from having made, or considering making, a disclosure of Reportable Conduct, such as:

- Termination of employment/contract or withholding of legal entitlements or subjection to unfair terms and conditions;
- Demotion or being overlooked for future promotion or career opportunities;
- Any form of harassment, bullying, intimidation or threatening behaviour;
- Discrimination;
- Current or future bias;
- Harm or injury, including psychological harm; or
- Damage to property, reputation, business or financial position

If the Reporter has been involved in the Reportable Conduct, they may be subject to disciplinary or remedial action as a result of any investigation. Although the act of making a disclosure of Reportable Conduct will not in itself protect the Reporter from the consequences of improper conduct in which they may have been involved, active cooperation in any investigation, admission and remorse may potentially mitigate any disciplinary action that may be taken against the Reporter.

Future Super will not tolerate a Reporter who reports or considers reporting Reportable Conduct, being subjected to harassment, retaliation or adverse consequences. A claim of such treatment will be regarded seriously. Any person who engages in taking adverse action may be subject to disciplinary action (including but not limited to termination of employment or engagement). In some circumstances, this may also be a criminal offence punishable by imprisonment and we may refer the matter to law enforcement authorities for investigation.

## 3.4 Protection Under the Corporations Act

In order for a Reporter to qualify for protection as a whistleblower under the *Corporations Act 2001*, all of the following conditions must be met:

- a. The Reporter must be an Eligible Whistleblower;
- b. The report must be about a Disclosable Matter; and
- c. The report must be made to:
  - i. An Eligible Recipient; or
  - ii. A legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act; or
  - iii. As part of an Emergency Disclosure or Public Interest Disclosure.

Where these conditions are met, the Reporter has qualified privilege<sup>11</sup> in respect of the disclosure.

If the Reporter qualifies for protection under the *Corporations Act 2001*:

- The Reporter cannot be subject to criminal prosecution (such as attempted prosecution for unlawfully releasing information), civil litigation (such as for breach of employment contract, duty of confidentiality, or other contractual obligation) or administrative action (including disciplinary action) by Future Super for making the disclosure or participating in any subsequent investigation by Future Super, even if the disclosure turns out to be incorrect. These protections do not grant immunity for any misconduct a Reporter has engaged in that is revealed as part of the disclosure.
- No contractual or other remedy may be enforced or exercised on the basis of the disclosure.
- A contract to which the Reporter is a party must not be terminated as a result of the Reporter making, or considering making, a report.
- If the Reporter's employment is terminated on the basis of the disclosure it can be reinstated by a Court.
- Victimization (i.e., detrimental treatment) of the Reporter is prohibited. The *Corporations Act 2001* makes it illegal for someone to cause or threaten detriment to a Reporter because they believe or suspect that the Reporter has made, may have made, or could make a whistleblower disclosure. A Reporter can seek legal compensation if they suffer loss, damage or injury for making an eligible disclosure.

## 3.5 Making a Complaint

If a Reporter believes there has been a breach of confidentiality or other right or due process once they have made a report, the Reporter can lodge a complaint internally with Future Super via the Contact Us section of the website or contact Your Call.

Alternatively, they can lodge a complaint with the Australian Financial Complaints Authority (**AFCA**). AFCA can be contacted by:

Mail: GPO Box 3, Melbourne VIC 3001  
Call: 1800 931 678  
Online: [afca.org.au](http://afca.org.au)

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<sup>11</sup> **Qualified privilege** is where a person, in making a disclosure, is not liable for defamation unless they are guilty of malice. Malice is an act done intentionally without just cause or excuse.

## 4. Responding to a Report

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### 4.1 Upon Disclosure

Within 48 hours of a report being received by an Eligible Recipient, and subject to consent being given by the Reporter to disclosure of their report:

- a. The Whistleblower Officer will be provided with the report;
- b. A Protection Officer will be appointed to the Reporter; and
- c. The Chief Executive Officer and/or the Chair of the FSG Board will be notified that a report has been received (but will not be given access to the content of the report).

If the Reporter consents to disclosure of their report, but does not consent to their identity being disclosed, the recipient of the disclosure must only disclose to the Whistleblower Officer information that is reasonably necessary for the purposes of investigating the report. All reasonable steps must be taken to reduce the risk of the Reporter being identified from this information. A Protection Officer will not be appointed.

An initial case assessment will be made by the Whistleblower Officer, and a decision will be made as to whether to formally investigate the report or to take no further action. In circumstances where the Reporter is anonymous and has not provided a means of contact, further investigation may not be possible. Where the Reporter is contactable, the Whistleblower Officer may request the Reporter to clarify or provide further information in order to assist this decision making process.

If the disclosure is assessed as requiring investigation, the Whistleblower Officer must immediately escalate the matter (with or without identifying details depending on the consent received) to the attention of the Chief Executive Officer and the Chair of the FSG Board. If both are implicated by the disclosure, the matter should be escalated to Future Super's external legal counsel.

A high-level summary of the disclosure (with no identifying details) will be provided to the FSG Risk Committee as part of the next scheduled quarterly compliance report.

The Whistleblower Officer will contact the Reporter to acknowledge receipt of a disclosure, assess whether the disclosure comprises Reportable Conduct, provide updates as the investigation progresses and is concluded, and where appropriate, notify the Reporter of the outcome.

### 4.2 Investigation

If the disclosure is assessed as requiring investigation, the Whistleblower Officer is responsible for allocating the matter to an appropriately qualified and suitable Investigator (either within Future Super or an external appointment) and overseeing the investigation.

Depending on the matter and the level of anonymity requested, the identity of the Reporter and those implicated in the matter may be withheld from the Investigator. If the Reporter has not consented to disclose their identity, the Investigator must also be required to take reasonable steps to reduce the risk of the Reporter being identified as a consequence of the investigation.

The objectives of the investigation will be to:

- a. Collate information relating to the allegations of Reportable Conduct as quickly as possible;
- b. Consider the information collected; and
- c. Draw a conclusion as to whether or not the Reportable Conduct is legitimate based on the evidence provided in an objective and impartial manner.

All investigations are required to comply with the principles of natural justice and procedural fairness. The investigation must be conducted without bias and the entity or person(s) against whom the allegation is made must be given a fair opportunity to respond. The investigation must be fully documented and conducted in a timeframe which is reasonable given the circumstances.

The Reporter will be provided with regular updates in relation to the investigation (if they are able to be contacted, including through anonymous channels). The timeframe may vary depending on the nature of the report. In some circumstances, it may not be appropriate to provide details of the outcome to the Reporter.

All Future Super Representatives are required to treat the investigation in absolute confidence. Any Future Super Representative revealing the presence of an investigation or details contrary to this Policy may be subject to disciplinary action.

### **4.3 Investigation Report**

Subject to any statutory confidentiality limitations, at the conclusion of the investigation the Investigator must prepare a written report detailing the matter, the findings, the reasons for the findings, and the rectification actions implemented or recommended for implementation, and provide it to the Whistleblower Officer.

Where the report indicates that Reportable Conduct has not occurred, the Whistleblower Officer will refer the matter to the FSG Risk Committee (for formal conclusion) and the Chief Executive Officer (for implementation of any actions that may be required in light of the report).

Where the report indicates that Reportable Conduct has occurred, the Whistleblower Officer will refer the matter to the FSG Risk Committee and the Chief Executive Officer for discussion and decision in respect of the steps to be taken to remedy any harm or loss arising from the conduct (including disciplinary proceedings or referral of the matter to the appropriate authorities) and the actions to be taken to prevent the conduct from occurring again in the future.

Any documents pertaining to the report, including subsequent investigations, findings, recommendations and meeting minutes, will be kept securely by the Investigator.

## 5. Fair Treatment of Persons Implicated

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No action will be taken against one or more Future Super Representatives who are implicated in a disclosure under this Policy until an investigation has determined whether any allegations against them are substantiated.

However, a Future Super Representative who is implicated may be stood down on full pay whilst an investigation is in process, or may be temporarily transferred to another office or workplace, if Future Super determines that it is appropriate, given all the circumstances, to do so. If the investigation determines that the allegations are not substantiated, the Future Super Representative must be immediately reinstated to full duties.

Any disclosures that implicate a Future Super Representative must be kept confidential, even if the Reporter has consented to the disclosure of their identity, and should only be disclosed to those persons who have a need to know the information for the proper investigation of the disclosure.

A Future Super Representative who is implicated in a disclosure has a right to be informed of the allegations against them, and must be given an opportunity to respond to those allegations and provide additional information, if relevant, in the course of an investigation into those allegations (subject to the Reporter's right to anonymity as set out in this Policy and applicable laws).

## Annexure A – Amendment History

		Whistleblowing Policy
		3.1
		<p>Future Super Group – applicable to:</p> <ul style="list-style-type: none"> <li>• Future Superannuation Group Pty Ltd (Parent Company)</li> <li>• Future Superannuation Holdings Pty Ltd (AFS Licensee)</li> <li>• Future Super Investment Services Pty Ltd (Investment Manager and CAR)</li> <li>• Future Super Services Pty Ltd (Resources and Tech Provider)</li> </ul>
		27 September
		The Board of Future Superannuation Group Pty Ltd - 27 September 2021
		Annual review or on material change
		Board of Future Superannuation Holdings Pty Ltd
Date of Modification	Brief Description of Modification	Reviewed and Approved By
1.0 – August 2018	Original policy.	FSG Board, 22 August 2018
2.0 – October 2019	Annual review.	FSG Board, 25 October 2019
2.0 – September 2020	Annual review; no changes required.	Not applicable
3.0 – March 2021	Annual review	FSG Board, 21 March 2021
3.1 – August 2021	Reviewed by Your Call (provider of external whistleblowing hotline engaged by FSG)	FSG Board, 30 August 2021