

WHISTLEBLOWER POLICY

Version 1.1 - September 2020

WT FINANCIAL GROUP LIMITED

ABN 87 169 037 058
(formerly known as Spring FG Limited)

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Section 1 Our Culture

Our Goals & Commitment

WT Financial Group Limited and its related bodies corporate including Wealth Today Pty Ltd and the entities comprising Spring Financial Group (together WT Financial Group) are committed to a culture of string corporate governance, honest a fair client service delivery and providing a working environment for our employees that is honest and open. To help achieve we have put guidelines and policies in place to ensure we live by these values in our day-to-day work.

Together with our values, we want to have feedback and encourage people to speak up when they see activity or behaviour that they feel is wrong or does not match our values. The goal of this policy is to provide very clear guidelines on how we approach and manage this feedback. With our whistleblowing policy, we aim to ensure:

- Every employee should have the chance to speak up anonymously when they feel we are not adhering to our corporate values. They should have a place to report misconduct, every report will be heard and acted on, and we will make improvements based on the results.
- WT Financial Group believes everyone should be able to make reports anonymously. We commit to protecting informant's identities and they only need to reveal themselves if they choose to.
- We will investigate every report of misconduct. At the end of the investigation, we will document the results and provide feedback when appropriate.

Our Commitment

WT Financial Group wants our employees to know they can provide information on any concerns they have, understand where they can report their concerns, know what happens after they make a report, and ensure they feel safe in providing a report.

WT Financial Group also wants to let them know about their right to be anonymous as well as how we, as an organisation, will ensure they are not subject to any retaliation or other abuse because they made a report.

What Conduct Should Be Reported

It is important that WT Financial Group outlines what behaviour we want to be reported under this

policy. We want to hear from you if you witness or know about any behaviour that is:

- Fraudulent;
- Illegal, corrupt, dishonest or unethical;
- Violates the law or any legal code;
- Is creating an unsafe environment;
- Breaches any of our company's policies;
- Discrimination, harassment and/or bullying of any kind;
- Any conduct which is detrimental to WT Financial Group and its clients could cause financial or non-financial loss

1.4 Who Falls Under This Policy

The following would be considered an "eligible person" and would fall under WT Financial Group's whistleblowing policy.

- Employees (including directors, managers, interns, and secondees);
- Corporate authorised representatives and authorised representatives;
- Contractors, consultants, service providers, suppliers, business partners;
- Former employees.

This policy applies to all WT Financial Group's businesses, divisions, and offices. It also applies across all jurisdictions where we operate. If local legislation, regulation, or laws provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

Section 2: Process for Making A Report

What Options Do Employees Have for Making A Report

If an employee or eligible person would like to make a report, they have different channels available where they can do this. Detailed instructions for how to use and approach each of these channels are included in Appendix 1.

- Anonymous electronic contact via the Spring or Wealth Today “contact form” at springFG.com or wealthtoday.com.au;
- Via post to our head office address;
- Speak with a senior leader at WT Financial Group;
- Speak with the managing director, chairman, or another director.

You Can Remain Anonymous

WT Financial Group respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed. At any given time, you can identify yourself, but this is your choice and at no point do you need to do this or will you be forced to provide your identity.

If you decide to disclose your identity, WT Financial Group will work to protect your identity and will outline and document who in the organisation will know you submitted your report. WT Financial Group will also take all steps necessary (and outlined in this policy) to ensure you do not suffer any retaliation.

It is worth noting that WT Financial Group will make every endeavour possible to investigate your report, but in some cases, there are limitations of what can be achieved if the informant decides to remain anonymous.

What Is the Investigative Process?

It is important for WT Financial Group to be transparent with our employees and outline what is the process for us to investigate a report submitted through our whistleblowing channels. Below, we have provided the different steps a case manager or member of our whistleblowing team will go through once a report is received until the case is closed.

- Report (anonymous or otherwise) is received.

- A case manager is assigned to the report to assess it and confirm its receipt.
- The case manager will do an initial assessment to confirm it is a valid report and request permission to investigate. Depending on the nature of the matter this may be an external third-party such as a law firm; or regulatory or industry body.
- The case manager will begin their investigation. This can include corresponding with the informant if there is a channel to do this.
- The case manager will investigate and update management and the informant per policy guidelines.
- Once the case manager has finalised their investigation and report, management and the informant will be updated.
- At this point, the case manager will hand everything over to management for any subsequent action to take place. Depending on the nature of the matter this may be an external third-party such as a law firm; or regulatory or industry body; or even the police.

How We Use 3rd Parties

At WT Financial Group, we utilise third-parties in our whistleblowing program and strategy. Examples of how we might utilise third-parties include:

- Accounting Firms: WT Financial Group uses third-party accounting firms to do forensic investigating of specific reports that come through our whistleblowing program.
- Investigative Firms: WT Financial Group may engage a specialist investigative firms to investigate specific cases where we do not have the skills needed in-house. They may also be used for investigations that we would prefer a third-party execute on due to the nature of the report.
- Human Resources Consultants: WT Financial Group may utilise human resources consultants across our business and they might be involved in specific whistleblowing cases, ensuring we use human resource best practices as we assess, investigate, and take action.

Who Is Alerted to A Report

Once a report is submitted (anonymous or not), this report goes to the managing director or the chairman. This person will then assess the report and assign it to a case manager, who will manage the investigation.

Certain senior managers might be alerted to the report as part of the reporting process or if they are involved in the investigation in some manner.

Any information that could potentially identify an anonymous informant will be held in the strictest confidence and will not be shared, unless WT Financial Group is compelled by law.

What Is the Process of Updating the Informant

As part of our investigative process, WT Financial Group will update the informant of the progress of the investigation. These updates can include the following:

- WT Financial Group has confirmed the receipt of a report from the informant.
- WT Financial Group has begun the investigative process.
- The investigation is currently ongoing.
- The investigation has been closed.

WT Financial Group's commitment is that the informant will be updated once a month while the investigation is ongoing. They will then be updated once the investigation has been closed.

WT Financial Group will strive to provide as much feedback on the investigation as possible. However, due to WT Financial Group's privacy guidelines, there often information that cannot be shared with the informant.

What If the Informant Is Not Satisfied with The Result?

If, after receiving the summarised report of the investigation, the informant is not satisfied with the result, they can escalate this to the chairman and the company secretary. The informant can provide this escalation in writing so that a formal review can take place. While the chairman and the company secretary commit to review the request, WT Financial Group is under no obligation to reopen the investigation. If the chairman and the company secretary concludes that the investigation was conducted properly and no new information exists that would change the results of the investigation, the investigation will be concluded.

Section 3: How Informants Are Protected

Anonymity After Submitting A Report

In section 2, above, we discussed how an eligible person can remain anonymous during the process of submitting a report. After submitting a report, the following policies around anonymity are in place to protect an informant's identity.

- The informant has the right to remain anonymous and does not need to identify themselves at any time during the investigation process.
- WT Financial Group uses tools and platforms that help protect an informant's identity during and after submitting a report.
- At no time will WT Financial Group force the informant to reveal their identity.
- The informant can refuse to answer questions they feel could identify themselves.
- If the informant reveals themselves at any time, you will document who will have access to their identity. This can include the case manager, whistleblowing program owner, etc.

Potential Retaliation

An informant might be concerned that staff, management, or the organisation might retaliate against them. In this case, WT Financial Group will protect the informant from:

- Being terminated or having their employment ceased;
- Performance management;
- Harassment on the job or workplace bullying;
- Warnings or disciplinary actions;
- Discrimination;
- Any other action that can be perceived as retaliation for making a report.

Considered Risk of Retaliation

In the case of "considered risk of retaliation", the informant believes retaliation is near or imminent, and they are targeted for retaliation. In cases of considered retaliation, the informant should contact the chairman and the company secretary.

The chairman or the company secretary will take the action they feel is appropriate as well as come up with recommendations for how the situation

can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include:

- The informant taking leave.
- The informant being reassigned to other duties and/or if possible being reassigned to another location.

Already Retaliated Against

If the informant feels that they have already been retaliated against, they should escalate this immediately to the managing director, chairman and the company secretary. The managing director, chairman, or the company secretary will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant after retaliation has occurred can include:

- The informant taking leave.
- The informant being reassigned to other duties and/or if possible being reassigned to another location.

Retaliation Not Adequately Resolved

If the informant feels their report of retaliation was not resolved adequately can escalate this case in writing. The report will need to go to chairman, and they will investigate the matter and process for how the retaliation was dealt with.

How WT Financial Group Deals with Retaliation

WT Financial Group does not tolerate any attempts to retaliate against an informant who has made a report. Any employee or associated person that found retaliating will face disciplinary action, including the potential to be terminated from their roles.

Separation of Issues

WT Financial Group will be able to still raise any issues related to work or performance related issues. While WT Financial Group will protect the informant from any retaliation, it is also important that they are still effective in their job.

WT Financial Group can still raise any performance or contract issues with the informant as long as they are kept separate and not influenced at all from any reports that have been made.

Protection & Immunity for Others

Other parties that might have to bear witness or are involved in the investigation will be protected

from retaliation in the same manner as the informant.

Legislative/Regulation Protection & Assistance

If in any jurisdictions or locales where WT Financial Group operates has whistleblowing protection laws that provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

Section 4: Our Roles & Responsibilities

Roles

The roles within WT Financial Group's whistleblowing program include the following:

- Program owner and whistleblowing protection officer (WPO) is the managing director;
- Day-to-day manager of WT Financial Group's whistleblowing program company secretary;
- Case managers that investigate individual reports may be third-parties or a senior staff member or the chairman or company secretary;
- Human resources who are involved in cases and made aware of specific investigations.

Responsibilities

The following are the responsibilities of each role in WT Financial Group's whistleblowing program.

{Please insert the specific responsibilities you have in your organisation. These are just common placeholders.}

WPO: This individual owns the entire program. This includes investigating reports, as well as being a point of escalation for any concerns or retaliation that has taken place. While this individual reports into the organisation, the results of their work goes directly to the Board of Directors.

They will view incoming anonymous reports, assigns these reports to case managers, and manage them as they conduct investigations. This person is the first line of escalation and works collaboratively with case managers to ensure anonymous reports are heard and acted upon.

Case managers: Case managers are assigned anonymous reports and their role is to investigate these reports. This includes interacting and asking questions of informants, as well as using the information provided to investigate the report submitted. Their investigation can be internal or external to the organisation depending on what was documented in the report. Their goal is to gather the facts and put forth a final report to management on what happened and what action they feel needs to take place.

Human resources: Colleagues from human resources may be called upon to provide advice and guidance during any investigation. The whistleblowing program leverages their expertise

and acumen to ensure WT Financial Group are using HR best practices during investigations and we are treating all employees fairly. This includes employees knowing and understanding the program, an easy process of making a report,

Section 5: Governance

Changes to WT Financial Group's Whistleblowing Policy

From time to time, WT Financial Group's whistleblowing policy will need to change to keep up with our values, best practices, improvements, as well as legislation and regulations.

Any changes to our whistleblowing policy will be communicated with all employees and any relevant stakeholders. This policy and any changes made do not form any contract of employment.

Any changes to WT Financial Group's whistleblowing policy must be approved by the Managing director, HR or the company secretary.

All changes will be reviewed by the Board of Directors and the Board can comment and provide feedback as necessary. All changes will also be documented in the whistleblowing policy and will be made available to all employees.

Reporting to the Board of Directors

The Board of Directors is updated as and when necessary on WT Financial Group's whistleblowing program, inclusive of reports, investigations, and results. Reports or investigations carrying an undue amount of risk will be reported to the Board of Directors immediately. The Board of Directors at any time can ask about anonymous reports, investigations, as well as the state of WT Financial Group's whistleblowing program.

WT Financial Group's whistleblowing program resides in the Audit & Risk Committee of the Board of Directors. They are responsible and accountable for the implementation and effectiveness of WT Financial Group's whistleblowing program.

Appendix 1: Channels for Reporting

- Anonymous electronic contact via the Spring or Wealth Today “contact form” at springFG.com or wealthtoday.com.au;
- Via post to our head office address;
- Speak with a senior leader at WT Financial Group;
- Speak with the managing director, chairman, or another director.

Appendix 2: Change Log

Version 1.1 created 25 September 2020

Appendix 3: Legislation/Regulation

Summary of the corporate sector whistleblower protection regime

<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/>

Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019

<https://www.legislation.gov.au/Details/C2019A00010>

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