

**WHISTLEBLOWER POLICY**

**Version 1.2 - 3 February 2026**

**WT FINANCIAL GROUP LIMITED**

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

## Board

Guy Hedley - Chairman  
*Non-executive Director*

Keith Cullen  
*Founder & Managing Director*

Chris Kelesis  
*Executive Director*  
Chelsea Pottenger  
*Non-executive Director*

## Company Secretary

Ian Morgan

## Registered Office

Level 5, 95 Pitt St  
Sydney NSW 2000  
Ph: 02 9248 0422  
wtfglimited.com

## Share Registry

Boardroom Pty Limited  
Level 12, 255 George St  
Sydney NSW 2000  
Ph: 02 9290 9600  
boardroomlimited.com.au

## ASX Listing Code

WTL

# WT FINANCIAL GROUP LIMITED

ABN 87 169 037 058

Sydney (Head Office)  
Level 5  
95 Pitt St  
Sydney NSW 2000  
T 1300 238 405

Melbourne  
Level 5  
380 St Kilda Road  
Melbourne VIC 3000  
T 1300 238 405

Perth  
Level 3  
52 Kings Park Road  
West Perth WA 6005  
T 1300 238 405

## 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 Vesta Wealth Partners (together WT Financial Group) are committed to a culture of strong 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.

This Whistleblower Policy outlines how WT Financial Group Limited (WT Financial Group) protects, supports, and manages disclosures of misconduct. The purpose is to:

- Encourage reporting of wrongdoing.
- Ensure disclosures are handled safely, lawfully, and confidentially.
- Meet obligations under the Corporations Act 2001 (Part 9.4AAA), ASIC RG270, ASX Corporate Governance Principles (4th Ed.) and all applicable legislation.

We aim to ensure:

- WT Financial Group encourages the reporting of misconduct and provides clear, safe, and confidential channels for raising concerns. 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 Can Be Reported (Disclosable Matters)

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:

- Misconduct, fraud, bribery, corruption, theft.
- Breaches of law or regulation (ASIC/APRA/ASX requirements).
- AFSL breaches or risks to clients.
- Conduct endangering public safety or financial system integrity.
- Data breaches, cyber incidents, privacy breaches.
- Systemic unethical behaviour, conflicts of interest.
- Harassment, discrimination, bullying (where systemic).
- Informants do not need to act in good faith, they must only hold reasonable suspicion that the information indicates misconduct or an improper state of affairs or circumstances.

### Who Falls Under This Policy (Eligible Whistleblowers)

The following individuals are considered *eligible whistleblowers* under the WT Financial Group Whistleblower Policy:

- Current and former employees, including directors, officers, managers, interns, and secondees.
- Authorised representatives and corporate authorised representatives.
- Contractors, consultants, service providers, suppliers, and business partners.
- Former employees and former contractors.
- Spouses, relatives, and dependants of current or former employees or contractors.
- Any individual who has a current or past business relationship with WT Financial Group and is in a position to observe misconduct.

**Scope of This Policy**

This policy applies to:

- WT Financial Group Limited and all subsidiaries.
- All employees, officers, directors, contractors, authorised representatives, suppliers, and business partners.

Any disclosure relating to conduct connected to WT Financial Group or any of its related entities.

## 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.

### 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 our case manager (Majda Okanovic) 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 confirm its receipt and determine whether the disclosure qualifies under the Corporations Act.
- 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. Evidence is stored securely and confidentially. 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 firm 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 who 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 is 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 conclude 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.
- Identity may not be disclosed without consent, except to ASIC, APRA, AFP or legal advisers.
- Breaches of confidentiality are a criminal offence.
- 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.

#### Privacy and Data Protection (Privacy Act 1988)

WT Financial Group is committed to handling all personal information collected through the whistleblowing process in accordance with the Privacy Act 1988 and the Australian Privacy Principles (APPs). Any personal information gathered as part of a disclosure, investigation, or related correspondence will be stored securely, accessed only by authorised personnel, and used solely for legitimate purposes connected to the management or investigation of the disclosure. WT Financial Group will take reasonable steps to protect all personal information from unauthorised access, modification, disclosure, or misuse, and will ensure that any information shared externally (for example, with regulators or external investigators) is provided in a manner consistent with legal obligations and the protection of the whistleblower's identity.

#### 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, demoted or disadvantaged, or having their employment ceased;
- Performance management;
- Harassment or intimidation on the job or workplace bullying;
- Warnings or disciplinary actions;
- Discrimination;
- Psychological or reputational harm;
- Any other action that can be perceived as retaliation for making a report.

Breaches of whistleblower confidentiality or victimisation provisions are offences under the Corporations Act and may attract civil penalties imposed by a court.

#### 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 the 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.

### **Fit and Proper Considerations (APRA CPS 520)**

WT Financial Group operates within a regulated financial services environment where certain individuals must meet "fit and proper" requirements under APRA Prudential Standard CPS 520 and other applicable laws. Where a whistleblowing disclosure identifies conduct that may affect the honesty, integrity, competence, or financial soundness of a responsible person or key individual, WT Financial Group may be required to assess or reassess that individual's fitness and propriety. Outcomes of whistleblower investigations may therefore be referred to the

Board or the Audit & Risk Committee for consideration under the Group's Fit and Proper Policy. Any such assessments will be conducted confidentially, lawfully, and independently of the whistleblower, and will not compromise the protections afforded to the informant.

### **Public Interest and Emergency Disclosures (Disclosures to Journalists or Parliamentarians)**

Under the Corporations Act 2001 (Part 9.4AAA), whistleblowers are permitted, in limited circumstances, to make protected disclosures to a journalist or a Member of Parliament (MP). These are called Public Interest Disclosures and Emergency Disclosures. If the strict conditions outlined below are not met, the disclosure will not be protected.

#### **A. Public Interest Disclosures**

A Public Interest Disclosure may be made where:

1. The whistleblower has previously made a disclosure to ASIC, APRA, or another prescribed body; and
2. At least 90 days have passed since the report was made; and
3. The whistleblower does not reasonably believe that action is being taken to address the concerns; and
4. The whistleblower has a reasonable belief that making a further disclosure is in the public interest; and
5. Prior to making the disclosure to an MP or journalist, the whistleblower has notified the regulator in writing of:
  - Their intention to make a Public Interest Disclosure; and
  - Reasonable details of the content they intend to disclose; and
6. The disclosure to the MP or journalist is no greater than necessary to inform them of the misconduct or improper state of affairs.

If these steps are not followed, the disclosure may lose its legal protections.

#### **B. Emergency Disclosures**

An Emergency Disclosure may be made where:

1. The whistleblower has previously made a disclosure to ASIC, APRA, or another prescribed body; and

2. The whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to:
  - the health or safety of one or more persons, or
  - the natural environment; and
3. Before making the disclosure to an MP or journalist, the whistleblower provides the regulator with written notice that includes:
  - their intention to make an Emergency Disclosure; and
  - details of the content they intend to disclose; and
4. The disclosure made to the MP or journalist is no more than is reasonably necessary to inform them of the substantial and imminent danger.

#### **C. Important Considerations**

- These disclosures are only protected if the strict legal preconditions above are met.
- WT Financial Group cannot authorise or provide advice on these disclosures but must acknowledge that whistleblowers have the right to make them if eligible.
- Whistleblowers are strongly encouraged to seek independent legal advice before making a Public Interest or Emergency Disclosure. Legal advice itself is protected.

#### **D. Availability of Legal Protection**

If all legislative requirements are met, Public Interest Disclosures and Emergency Disclosures are protected in the same manner as internal disclosures, including:

- Confidentiality of identity;
- Protection from detriment or retaliation; and
- Civil, criminal, and administrative liability immunity.

Failure to meet the criteria may result in the loss of these protections.

WT Financial Group encourages whistleblowers to seek independent legal advice before making any Public Interest or Emergency Disclosure, noting that disclosures made to legal practitioners for the purpose of obtaining advice are automatically protected under the Corporations Act.

## 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 is the 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.

**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 result 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 de-identified reports of disclosures, investigations, and results. Material incidents, 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: Internal Reporting Channels**

- Confidential electronic contact via the Spring or Wealth Today “contact form” at wtfglimited.com or wealthtoday.com.au;
- Via post to our head office address;
- Speak with a senior leader at WT Financial Group;
- Chair of Audit & Risk Committee;
- WPO (Company Secretary);
- Speak with the managing director, chairman, or another director.

**Appendix 2: External Reporting Channels**

- ASIC: [asic.gov.au/whistleblowing](https://asic.gov.au/whistleblowing)
- APRA: [apra.gov.au](https://apra.gov.au)
- AFP (criminal matters)

**Appendix 3: Legislation/Regulation**

Summary of the corporate sector whistleblower protection regime

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

[Corporations Act 2001 \(Part 9.4AAA\)](#)

[ASIC Regulatory Guide 270](#)

[APRA Prudential Standard CPS 520](#)

[ASX Corporate Governance Principles \(4th Ed.\)](#)

AICD Guidance 2024

[Privacy Act 1988](#)

**Appendix 4: Change Log**

Version 1.3 created 3 February 2026.

The current policy will be available on WT Financial Group’s website.

The policy is reviewed annually or after legislative changes and any changes are approved by the Board.