

TASK GROUP

Whistleblower Policy

JANUARY 2024

TASK.

Whistleblower Policy

1. Purpose

TASK Group Holdings Limited (**TASK** or **Company**) is committed to high standards of conduct and ethical behaviour in our business activities. We promote and support a culture of honesty and good ethical practice, corporate compliance and corporate governance.

The Company encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving the Company's businesses. The Company provides protections and measures so that anyone who makes a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

Conduct that appears illegal, unethical or otherwise improper, should be reported but you may feel apprehensive about raising your concerns because of the fear of possible adverse repercussions to you. This Whistleblower Policy (**Policy**) aims to make you feel confident about raising concerns internally, by offering a reporting and investigative mechanism that is objective, confidential, independent and protects you from reprisal or disadvantage.

2. Scope

The Policy applies to current and former:

- directors and alternate directors;
- officers, employees (including permanent, fixed-term, seconded and casual employees) and independent contractors;
- service providers (e.g. auditors, accountants, brokers and consultants) and suppliers (whether paid or unpaid); and
- employees of these service providers or suppliers of TASK Group Holdings Limited and, if applicable, its subsidiaries (**Group**).

This Policy encourages stakeholders to have the confidence to speak up and report company wrongdoing and supports the Company's values as set out in our Code of Conduct and in particular the expectation that all personnel act professionally, responsibly, lawfully and ethically in all dealings and operations involving the Company.

This Policy covers reports about company wrongdoing, including any conduct by Group entity directors, employees, or contractors deemed unethical, dishonest, improper, illegal or a danger to the public or financial system.

Personal work-related complaints or grievances (e.g. interpersonal conflicts, promotion decisions and disciplinary actions) should be lodged or raised under the Group entity's relevant grievance procedure.

3. Stakeholders and responsibilities

- The Chief Executive Officer of each Group entity is responsible for fostering a culture of compliance across the Company.
- The Audit and Risk Management Committee has overall responsibility for implementing and reviewing the Policy.
- Subsidiary Boards are accountable for the effectiveness of reporting mechanisms, investigation and actions taken to address the concerns.
- Managers are responsible to provide an overview and a copy of this Policy to new employees at induction.

4. What is Reportable Conduct?

You may make a report under this Policy if you have reasonable grounds to suspect that a director, officer, employee, independent contractor, supplier, tenderer or another person who has business dealings with the Company has engaged in conduct (**Reportable Conduct**) which:

- is dishonest, fraudulent or corrupt, including bribery;
- is an illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- is unethical or in violation of the Company's policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching the Company's Code of Conduct or other policies or procedures);
- conceals Reportable Conduct;
- is potentially damaging to the Company, a Company employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of the Company's property or resources;
- amounts to an abuse of authority;
- endangers the public or the financial system;
- may cause financial loss to the Company or damage its reputation or be otherwise detrimental to the Company's interests;
- involves serious harassment, discrimination, victimisation or bullying; is an offence punishable by imprisonment of 12 months or more; or
- involves any other kind of misconduct or an improper state of affairs or circumstances.

5. Who can I make a report to?

The Company has several channels for making a report if you become aware of any issue or behaviour which you consider to be Reportable Conduct.

To ensure appropriate escalation and timely investigation, we request for reports under this Policy, be made to one of our Whistleblower Protection Officers, which includes:

- Head of P&C, Michelle Williams
michelle.williams@tasksoftware.com;
- the Company Secretary, Maria Clemente
maria.clemente@boardroomlimited.com.au ; or
- the Chair of the Audit and Risk Management Committee, Manda Trautwein
manda.trautwein@williambuck.com.

Reports should be marked to the attention of the Whistleblower Protection Officer. Reports can be sent by email to the Whistleblower Protection Officer or mailed to the Company's registered office. For further contact details refer to the Company's website <https://tasksoftware.com/contact>.

Under the Corporations Act (Cth), the report may also be made to the following people or bodies:

- any director of the Company;
- the Company's external auditor; or
- Australian Securities and Investments Commission (**ASIC**) or Australian Prudential Regulation Authority (**APRA**).

Persons making a report may wish to remain anonymous or place restrictions on who knows their identity. The Company will comply with these requests to keep the identity of these persons anonymous. However, disclosers who wish to remain anonymous should maintain ongoing two-way communication with the

Company to facilitate follow-up questions or provide updates and feedback.

Certain reports may qualify for protection if made to legal practitioners, the police or other regulatory bodies such as the Australian Taxation Office, ASIC and APRA. In limited circumstances, where the disclosure qualifies as "public interest" or "emergency" disclosure under Australian law, you may report to journalists or members of the Commonwealth, State or Territory parliaments for the report to qualify for protection.

6. Investigation of Reportable Conduct

We investigate and record all reports fairly, objectively and confidentially. The Company will investigate all matters reported under this Policy as soon as practicable after the issue has been reported. A Whistleblower Protection Officer may, with your consent, appoint a person to assist in the investigation of a report.

The particular investigation process and enquiries adopted will be determined by the nature and substance of the report. Shortly after receipt of the report, the Whistleblower Protection Officer or investigator will discuss the investigation procedure with you.

Where a report is submitted anonymously, the Company will conduct the investigation and its enquiries based on the information provided to it.

7. What information do I need to provide in my report?

For a report to be investigated, it must contain enough information to form a reasonable basis for investigation. It's important, therefore, that you provide as much information as possible. This includes any known details about the events underlying the report, including:

- date;
- time;

- location;
- name of the person(s) involved;
- possible witnesses to the events; and
- other evidence of the events (e.g. documents, emails)

In your report, describe any steps you have taken previously to report the matter elsewhere or resolve the concern.

If a report does not contain sufficient information to form a reasonable basis for investigation, the investigator will request additional information from you. If this additional information is not able to be obtained, and the investigation is unable to be completed, then the report will be closed, and you will be informed.

8. How long will the investigation take?

The investigation process will vary depending on the nature of the Reportable Conduct and the amount of information provided. The investigator aims to conclude the investigation within six (6) weeks of the report.

If the report raises complex issues and the investigator considers it impossible to conclude the investigation within six (6) weeks, an attempt will be made to notify the individual who reported the concern of the expected investigation timeframe.

If there is insufficient information to warrant further investigation, or the initial investigation immediately identifies there is no case to answer, the investigator will notify you at the earliest possible opportunity.

9. How will I receive information on my investigation?

The investigator assigned to handle your whistleblower report will tell you the outcome of the investigation unless prevented by law from doing so.

The investigator also notifies the Company's Board of Directors of the outcome of the investigation. Potential outcomes include:

- your concern was substantiated, and appropriate action has been taken;
- your concern was not substantiated, and no further action will be taken unless further evidence becomes available;
- a determination was not possible, and no further action will be taken unless further evidence becomes available; and
- you may be provided with further feedback, subject to the privacy and confidentiality rights of any individual under investigation and any other confidentiality requirements.

10. What happens if the concern is substantiated?

Where the investigator substantiates the report, the Company will consider whether changes to internal processes and systems are required to reduce the likelihood of the Reportable Conduct happening again. Where a person is found to have engaged in misconduct, the matter will be dealt with under the Company's disciplinary procedures. This may result in disciplinary action, including dismissal.

Criminal matters will be reported to the police or other appropriate regulatory authorities.

11. What if I am not satisfied?

If you believe that your report was not dealt with according to this Policy, or are dissatisfied with the investigation outcome, then you may escalate the matter to the Chair of the Board.

12. Protection of Whistleblowers

The Company is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that those who make a

report are treated fairly and do not suffer detriment.

Unless the report is deliberately false, a person who has made a report in accordance with applicable laws is protected from civil, criminal and administrative liability in relation to their disclosure. In particular, a person who has made a report is not taken to have committed any offence against any legislation which imposes a duty to maintain confidentiality with respect to any information disclosed. However, these protections do not grant immunity for any misconduct the discloser has engaged in that is revealed in their report.

A person making a report under this Policy who is located overseas (e.g., an employee of a foreign incorporated subsidiary within the TASK Group) may have whistleblower rights under the applicable foreign legislation. These rights will be in addition to, and not in lieu of, those rights under the Corporations Act (Cth).

12.1 Protection against retaliatory action or victimisation

Retaliatory action includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report. If you are subjected to detrimental treatment or any form of victimisation as a result of making a report under this Policy, you should inform a Whistleblower Protection Officer.

If you suffer any undue loss connected with making a report under this Policy, the Company shall, after making appropriate enquiries/ investigations, compensate you or provide another appropriate remedy. You may seek independent legal advice if you believe that you have suffered retaliatory action.

The Company may take disciplinary action which may include dismissal against any person who causes detriment to a person because they believe or suspect that the

person has made, proposes to make or could make a disclosure under this Policy.

Australian law provides that a court may order a person who causes detriment to a whistleblower to pay the whistleblower compensation (or other remedies) in respect of any loss, damage or injury suffered as a result of making a disclosure of Reportable Conduct.

12.2 Protection of your identity and confidentiality

Upon receiving a report under this Policy, the Company will only share your status as a whistleblower or information likely to reveal your identity if:

- (a) you consent in writing;
- (b) a person with knowledge of the report reasonably believes that disclosure of identifying information:
 - (i) is essential to the effective investigation of the allegations in the report; or
 - (ii) is essential to prevent serious risk to public health or public safety or the environment; or
 - (iii) is essential having regard to the principles of natural justice.

The Company will otherwise use its best endeavours not to disclose this information.

Whistleblowers are assured that a release of information in breach of this Policy will be regarded as a serious matter and dealt with under the Company's disciplinary procedures. Any disclosures of your identity or information likely to reveal your identity will only be made on a strictly confidential basis.

12.3 Protection of files and records

All files and documents created from an investigation will be retained securely.

The unauthorised release of information to someone not involved in the investigation (other than senior managers or directors) without your consent as a whistleblower will be a breach of this Policy.

13. Duties of employees concerning Reportable Conduct

It is expected that employees of the Company who become aware of actual, suspected or potential cases of Reportable Conduct will make a report under this Policy or under other applicable policies

14. Reporting procedures

The Whistleblower Protection Officer will report to the Company's Board on the number and type of whistleblower incident reports. These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this Policy.

The Company's Board will receive copies of all whistleblower reports from the Whistleblower Protection Officer (with identifying details redacted). In addition, serious or material Reportable Conduct will be considered by the Whistleblower Protection Officer for immediate referral to the Audit and Risk Management Committee.

15. False reporting

A false report of a reportable matter could significantly affect the Company's reputation and the reputations of Officers and other staff members and could also cause considerable misuse of time and effort. Any deliberately false reporting of a Reportable Conduct, whether under this Policy or otherwise, will be treated as a serious disciplinary matter.

16. Training

The Company will provide training to employees in respect of their rights and obligations under this Policy and will provide

training to managers and other employees who may receive disclosures under this Policy on how to handle those disclosures.

17. Questions

Any questions about this Policy should be directed to the Whistleblower Protection Officer.

18. Policy review process

This Policy will be reviewed for its effectiveness, on an annual basis by the Audit and Risk Management Committee, in particular to ensure that whistleblower incident reports are being appropriately recorded, investigated and responded to, and to consider whether any changes are required to this Policy and procedures.

This Policy may be updated as and when determined by the Board.

This Policy was last reviewed in January 2024.