Bravas Group Whistleblower Policy

1. Purpose and Commitment

If you see or suspect serious wrongdoing, we encourage you to speak up. You can report concerns safely, confidentially, and (if you prefer) anonymously. We will assess reports, investigate where appropriate, and protect people who make protected disclosures from retaliation.

Speaking up plays an important role in protecting our customers, our people and the long-term sustainability of the Bravas Group. We recognise that raising concerns can feel difficult. If you speak up with genuine concerns about misconduct or wrongdoing, your concern will be taken seriously, handled respectfully and assessed fairly – even if it later turns out to be mistaken.

This policy helps identify and address wrongdoing, encourages early reporting, deters misconduct, and supports an ethical and compliant culture across the Bravas Group. We are committed to handling disclosures promptly, fairly and confidentially.

This policy explains:

- what you can report (and what is better handled as a workplace grievance)
- who can make a report and who can receive it
- how to make a report (including anonymously and outside business hours)
- the legal protections available and the practical support we provide
- how we handle and investigate reports, and how we ensure fair treatment for everyone involved
- how the policy is shared and made accessible.

2. Scope

This policy applies to PF Holdco Pty Ltd and its related bodies corporate (together, **Bravas, Bravas Group, Group**) operating in Australia and New Zealand. The Group entities covered by this policy are listed in the Definitions section. This policy is designed to meet whistleblower protection requirements in both jurisdictions. Where a disclosure relates to Australian operations, Australia's corporate whistleblower regime applies. Where a disclosure relates to New Zealand operations, the Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ) applies. If there is any inconsistency, the applicable law will prevail.

3. Who this policy applies to (who can speak up)

This policy covers "eligible whistleblowers" under Australia's corporate whistleblower laws. In practical terms, you can use this policy if you are, or have been:

- an officer (including a director or company secretary) or employee of the group
- a contractor, consultant, supplier or service provider to the group (paid or unpaid), or an employee of one of those suppliers
- an associate of the group
- a relative, dependant or spouse of any of the people listed above.

4. What can you report

A protected disclosure relates to a "disclosable matter". This means information that you have reasonable grounds to suspect concerns misconduct, wrongdoing, or an improper state of affairs or circumstances affecting the Group (or a related body corporate).

Examples of disclosable matters include:

- fraud, theft, money laundering or misuse of company funds
- bribery or corruption
- serious breaches of laws or regulatory obligations (including financial services laws)
- serious risks to customers, the public, or the financial system
- unethical conduct that is systemic or poses significant harm
- retaliation or threats of retaliation against someone for raising a concern.

You do not need to prove your concern, but you should have reasonable grounds for your suspicion.

Personal work-related grievances

Personal work-related grievances are usually not protected under the corporate whistleblower laws. These are issues that relate to your employment and affect you personally (for example, interpersonal conflict, decisions about promotion, or performance management) and do not have broader implications for the organisation.

However, a personal grievance may still be protected if it:

- includes information about misconduct, or is accompanied by a report of misconduct
- relates to conduct that may constitute a serious breach of law, including conduct punishable by imprisonment for 12 months or more, or conduct that presents a danger to the public
- involves retaliation (or a threat of retaliation) because you have made, may make, or are believed to have made a protected disclosure
- is a request for legal advice about the whistleblower protections.

If your concern is a personal grievance and not a disclosable matter, you should normally raise it through your manager or HR. If you are unsure, you can ask the Whistleblower Protection Officer (WPO) for confidential guidance (without making a disclosure).

Customer Complaints

Customer complaints are usually not whistleblower matters and should be handled through the Group's customer complaints and dispute resolution processes.

However, a matter may be appropriate under this policy if it involves:

- systemic or repeated customer harm
- serious misconduct, fraud or unethical behaviour
- deliberate mis-selling or falsification of records
- serious breaches of law or regulatory obligations

Reasonable Grounds for Reporting

You do not need to prove your concern or be certain that wrongdoing has occurred. However, disclosures should be made honestly and based on information that gives you reasonable grounds to suspect misconduct or an improper state of affairs. A disclosure may still be protected even if it later turns out to be incorrect. Deliberately false, misleading or malicious reports are not protected and may be dealt with under the Group's disciplinary processes.

Other Concerns

If a concern is assessed as not qualifying for whistleblower protection, it will still be handled appropriately and may be referred to another internal process such as customer complaints, HR or compliance.

5. How to make a disclosure

When can I make a report?

When you report, first make sure you are satisfied you have reasonable grounds to do so, then please include as much detail as you can (what happened, who was involved, when and where it occurred, and any supporting documents). If you do not have all the details, you can still report—share what you know.

Who can I make a report to?

To qualify for protection under the corporate whistleblower laws, a disclosure must be made to an "eligible recipient" or another protected pathway (such as a regulator or a legal practitioner).

We encourage you to report to the **Whistleblower Protection Officer (WPO):**

Camilla Brogan, Chief Risk Officer

Email: camilla.brogan@bravas.com.au

Phone: +61 478 361 573

Within the organisation, other eligible recipients include:

- **Group Chief Executive Officer, James Woodhams**
  Phone: 0407 988 375
  Email: james.woodhams@bravas.com.au
- **Non-executive Director, Stephen Palyga (our Compliance Director)**
  Phone: 0433 213 141
  Email: s.palyga@outlook.com
- **EY as the group's external auditors – attention Brad Tozer**
  Phone: 07 3243 3333 or 07 3243 3721
  Email: brad.tozer@au.ey.com

You can use these channels outside business hours. You can ask for confidentiality when you report.

We encourage you to make disclosures through the Whistleblower Protection Officer (WPO) or one of the other reporting channels outlined in this policy. If you make a disclosure to another eligible recipient, the recipient may refer the matter to the WPO where appropriate to ensure it is handled under this policy and that appropriate protections are considered.

To help us assess and manage your concern, please let the recipient know that you wish to make a disclosure under this Whistleblower Policy.

Where a disclosure concerns the conduct of the WPO, the matter should be reported directly to Stephen Palyga our Compliance Director. The Compliance Director will assume the responsibilities of the WPO under this policy, or appoint an alternative suitably qualified person to oversee the disclosure and any investigation.

You may also make a protected disclosure to:

- a legal practitioner for legal advice or representation about whistleblower protections
- regulators such as ASIC, APRA, or the ATO
- in limited circumstances, a journalist or a parliamentarian as a "public interest disclosure" or an "emergency disclosure" (strict criteria apply).

Emergency and public interest disclosures

A whistleblower may receive legal protection for disclosing information to a journalist or a parliamentarian. These protections only apply if all conditions are met as listed below. Independent legal advice should be sought before making this type of disclosure.

Public interest disclosure:

- You have already made a protected disclosure to ASIC, APRA or another prescribed Commonwealth body.
- At least 90 days have passed since that disclosure.
- You do not have reasonable grounds to believe that action is being taken or has been taken to address the matter.
- You have reasonable grounds to believe that making the disclosure is in the public interest.
- Before speaking to a journalist or parliamentarian, you have given written notice to the regulator that:
  - identifies the earlier disclosure, and
  - states your intention to make a public interest disclosure.

- Only information necessary to explain the disclosable matter is shared.

Emergency disclosure:

- You have already made a protected disclosure to ASIC, APRA or another prescribed Commonwealth body.
- You have reasonable grounds to believe the information concerns a substantial and imminent danger to people's health or safety, or to the natural environment.
- Before making the emergency disclosure, you have given written notice to the regulator that:
  - identifies the earlier disclosure, and
  - states your intention to make an emergency disclosure.
- Only information necessary to explain the imminent danger is shared.

Anonymous disclosures

You may choose to make a disclosure anonymously. If you do, you can still receive the protections available under applicable whistleblower laws and you may remain anonymous during and after any investigation. If you choose to be anonymous, we encourage you to keep a way for us to communicate with you (for example, an anonymous email address) so we can ask follow-up questions and provide updates.

Examples of anonymous reporting options include:

- an email address that does not identify you
- calling with caller ID switched off (especially to an external recipient)
- a letter sent without identifying details (ideally with a safe return method so we can follow up).

You may also use a pseudonym.

6. Legal protections for disclosers

If you make a protected disclosure, the law provides important protections. These apply to internal and external disclosures that meet the legal criteria.

Confidentiality (identity protection)

There are laws that protect the confidentiality of whistleblowers. These laws restrict the disclosure of a whistleblower's identity, or information that is likely to identify them, whether or not confidentiality has been expressly requested. We are committed to complying with these protections and to safeguarding whistleblowers who speak up.

Where a disclosure is investigated, we will take all reasonable steps to reduce the risk that a whistleblower could be identified. This includes carefully managing the information that is shared, limiting access to those who need to know, and handling all records and communications securely.

A whistleblower's identity will only be disclosed with their express consent, except where disclosure is permitted or required by law. The limited circumstances in which a whistleblower's identity may be disclosed without consent include:

- disclosure to a regulator such as ASIC, APRA, or the ATO (for tax-related matters);
- disclosure to a legal practitioner for the purpose of obtaining legal advice or representation about whistleblower protections; or
- any other circumstance permitted under applicable whistleblower legislation.

Even where identity is disclosed in these limited circumstances, we will continue to take reasonable steps to minimise the risk of identification and to protect the whistleblower from retaliation.

Protection from retaliation (detriment)

There are laws that protect whistleblowers from retaliation. A person must not cause, threaten, or attempt to cause detriment to someone because they have made, may make, or are believed to have made a protected disclosure. We are committed to upholding these protections and to taking concerns about retaliation seriously. Any person found to have engaged in retaliation or victimisation may be subject to disciplinary action, up to and including termination of employment or engagement.

Detriment can take many forms and is not limited to formal disciplinary action. It may include:

- dismissal, termination of employment, or forced resignation
- demotion, loss of seniority, or adverse changes to role, duties, or responsibilities
- discrimination, unfair treatment, or disadvantage in employment decisions
- harassment, bullying, intimidation, or victimisation
- psychological harm, stress, or other impacts on mental health
- reputational harm, including damage to professional standing or career prospects
- damage to a person's business, livelihood, or financial position
- threats, coercion, or pressure intended to discourage speaking up or continuing to cooperate with an investigation.

Examples of actions that are not detrimental conduct include:

- administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
- properly managing a discloser's unsatisfactory work performance.

We will take reasonable steps to assess and manage the risk of retaliation from the time a disclosure is received and throughout any investigation. If you believe you have experienced, or are at risk of, retaliation, you should report this immediately to the WPO.

Compensation and other remedies

A whistleblower (or any other affected person) may be able to seek compensation or other remedies through the courts if they suffer loss or harm because of a protected disclosure. If you are considering legal action, seek independent legal advice.

Liability protection

The law protects whistleblowers from certain civil, criminal and administrative liability for making a protected disclosure. Examples include:

- civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution, other than for making a false disclosure); and
- administrative liability (e.g. disciplinary action for making the disclosure).

This does not provide immunity for any misconduct you may have been involved in that is revealed by your disclosure.

7. Support and practical protection for disclosers

We will take practical steps to support disclosers and reduce the risk of retaliation. Steps may include:

- limiting access to information to people who need it to handle the disclosure
- secure storage of documents and careful handling of communications
- discussing with you how your identity could be protected and what support you need
- assessing and managing risks of retaliation promptly
- adjusting work arrangements (e.g., location, reporting line, or duties) where reasonable to protect you
- offering support services such as counselling.

If you believe you have experienced retaliation, tell the WPO immediately. You may also report to a regulator (e.g., ASIC, APRA, or the ATO).

8. How we handle and investigate disclosures

We will handle disclosures objectively, fairly and as confidentially as possible. The process and timing may vary depending on the report, but the usual steps are:

Step 1 – Acknowledge and assess

We will acknowledge receipt of the disclosure in writing (if contactable) as soon as practicable and assess whether the report is likely to qualify for whistleblower protection and whether a formal investigation is required.

Step 2 – Plan the investigation

If an investigation is required, we will define the scope, key steps, who will investigate, whether specialist advice is needed, and an expected timeframe. We will share this with you (where contactable) and consider any feedback.

Step 3 – Investigate

Investigations will be independent (as far as practicable), fair and documented. We may speak with relevant people and review documents. We will take reasonable steps to keep you updated.

Step 4 – Findings and outcomes

We will prepare a written investigation report. Where appropriate and lawful, we will share an outcome summary with you. We will also report outcomes internally to those responsible for oversight of this policy, while protecting confidentiality.

Limits to investigations

Sometimes investigations are limited. For example, we may be unable to contact you to obtain further information (particularly where a disclosure is made anonymously), or confidentiality obligations may limit the information we can share about the investigation or its outcome. We will nevertheless take reasonable steps to assess and address the issues raised.

If you are dissatisfied with the outcome, we will not normally re-open the investigation unless new information becomes available. You may also raise concerns with a regulator (such as ASIC, APRA or the ATO).

9. Fair treatment for people mentioned in a disclosure

We will also protect the rights of employees and others who are mentioned in a disclosure or are the subject of an investigation. This includes:

- handling matters confidentially where practical and appropriate
- ensuring allegations are assessed and investigated where warranted
- ensuring investigations are objective, fair and independent
- providing a fair opportunity for a person to respond to allegations before any adverse finding is made, consistent with procedural fairness and the needs of the investigation
- offering support services (such as counselling) to people involved.

10. Making this policy accessible

We will make this policy available to officers and employees and ensure it is easy to find for internal and external audiences (for example, on our intranet and external website). The Group may provide training, guidance or awareness activities from time to time to support understanding of this policy.

11. Roles and Responsibilities

Role	**Responsibility**
Board	• The Board has ultimate oversight of the whistleblower framework and is responsible for approving this policy. The WPO will report to the Board on disclosures and outcomes to the extent confidentiality permits. • The Board receives periodic de-identified reporting regarding disclosures, investigations, outcomes and emerging themes to support oversight of the whistleblower framework as applicable.

People Leaders	• Leaders must support a speak-up culture, promptly escalate whistleblower disclosures received by them, maintain confidentiality and refrain from retaliatory conduct.
Whistleblower Protection Officer (WPO)	• The WPO oversees the day-to-day operation of this policy, safeguards disclosers, supports investigations, and ensures privacy, security and confidentiality of information. • The WPO may provide confidential guidance regarding this policy and available whistleblower protections without requiring a person to make a formal disclosure. • The WPO will periodically review this policy and the effectiveness of the Group's whistleblower framework to ensure it remains effective, relevant and up to date. An independent or external review may be used where appropriate.

12. Definitions

Term	**Definition**
Bravas Group	PF Holdco Pty Ltd, PF Bidco Pty Ltd, PF Bidco NZ Limited, Hunter Premium Funding Pty Ltd, Principal Finance Pty Ltd, Arteva Funding and all other Subsidiaries.
Eligible Whistleblower	A person who is entitled to make a protected disclosure under applicable whistleblower laws. This includes current and former officers, employees, contractors, consultants, suppliers, associates, and certain relatives, dependents and spouses of those persons.
Eligible Recipient	A person designated by the Group under this policy to receive and handle whistleblower disclosures. For the purposes of this policy, Eligible Recipients are the individuals listed in Section 5.
Disclosable Matter	Information that a person has reasonable grounds to suspect concerns of misconduct, an improper state of affairs or circumstances, a breach of law, or other conduct that may qualify for protection under applicable whistleblower laws.
Whistleblower Protection Officer (WPO)	The person appointed by the Group to receive and oversee whistleblower disclosures, support and protect disclosers, safeguard confidentiality, and oversee the operation of this policy.
Serious Wrongdoing (NZ)	Serious Wrongdoing has the meaning given in the Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ) and generally includes unlawful, corrupt or irregular conduct, serious misconduct, misuse of authority, funds or resources, serious risks to health and safety or the environment, and serious breaches of law.

13. Document Information

Policy Name	Bravas Whistleblower Policy
Policy Owner	Chief Risk Officer
Document Category	1 - Board Approved
Area of Application	Bravas Group and all subsidiary entities/brands
Frequency of Review	Every three years
Effective Date	22.07.2026
Next Review Date	01.07.2029

Appendix A - New Zealand Whistleblower Framework

New Zealand's whistleblower regime is governed by the Protected Disclosures (Protection of Whistleblowers) Act 2022. Protected disclosures relate to serious wrongdoing and provide confidentiality, protection from retaliation, and immunity from civil, criminal and disciplinary proceedings. This appendix provides a summary of how the whistleblower framework applies to New Zealand operations.

Nothing in this appendix limits or replaces any rights or protections available under New Zealand law.

Serious Wrongdoing

Under New Zealand law, protected disclosures relate to information about serious wrongdoing in or by an organisation.

Examples may include:

- unlawful, corrupt or irregular conduct;
- serious misconduct;
- conduct that creates a serious risk to public health or safety;
- conduct that creates a serious risk to the environment;
- misuse of authority, funds or resources; or
- serious breaches of law.

You do not need to prove that serious wrongdoing has occurred. However, disclosures should be made honestly and based on information that gives reasonable grounds for concern.

Who Can Raise a Concern

A protected disclosure may be made by a current or former employee, contractor, secondee, volunteer, board member or other person performing work for or on behalf of a Bravas Group entity in New Zealand.

How to Make a Disclosure

Concerns may be reported using any of the reporting channels set out in this Policy, including the Whistleblower Protection Officer and other eligible recipients listed in Section 5.

A disclosure may also be made directly to an appropriate authority in accordance with New Zealand law.

Confidentiality and Protection

The Bravas Group will take reasonable steps to protect the confidentiality of people who make protected disclosures and to protect them from retaliation or disadvantage because they have raised a concern.

A person who makes a protected disclosure in accordance with New Zealand law may also be entitled to additional statutory protections, including confidentiality and immunity from certain civil, criminal and disciplinary proceedings.