



Speak Up and Protected Disclosure Policy

October 2025

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1. Introduction

What is it

This policy establishes the Quantum team member Speak Up Program, which is managed by a third-party provider. The Speak Up Program provides a clear pathway for all team members to raise concerns about conduct that they feel is not in line with applicable laws, the expected behaviours of our team or leaders, or our values as outlined in the Appropriate Workplace Behaviours and Resolution Policy or other Quantum policies.

This policy contains important information about how to make a Speak Up report (including a 'protected disclosure'), how these reports will be handled and the support and protections available.

Why this matters

At our core, we believe our greatest innovations emerge when everyone feels safe to speak openly and honestly. When we speak about conduct that doesn't align with our values or policies, we strengthen our culture of trust and integrity, enabling us to forge a better, more intelligent world.

Who we include

The Speak Up Program is available to current and former team members (both employees and contractors) who work for, or are contracted to, Quantum, as well as their associates and families, globally.

2. What you can use Speak Up for

The Speak Up Program is a dedicated alternative channel for Quantum team members to raise concerns about conduct that arises during the course of workplace activities, that fails to comply with our policies, values or applicable laws. Some examples of such conduct include:

- a breach of the law, including employment, workplace, discrimination, or health & safety laws
- bullying and harassment (including sexual harassment)
- human rights and modern slavery issues
- sanctioned activities, such as importing and exporting goods or dealing with sanctioned individuals and companies
- improper use or disclosure of confidential information
- dishonest or unethical behaviour, including conflict of interest
- a breach of Quantum's Code of Conduct or Policies
- a criminal offence including fraud, theft, bribery, kickbacks, money laundering, corruption, secret commissions
- conduct that may cause harm to the public or the financial system (even if it does not involve a breach of particular law)
- misconduct
- a deliberate concealment of any of the above.

To ensure that we can investigate reports in a fair and comprehensive manner, it's important that you have reasonable grounds for your concern. Making knowingly false reports may lead to disciplinary action.

3. What you should not use Speak Up for

Typically, **interpersonal workplace conflicts or grievances** should be raised, in line with our Grievance Handling Policy, with one of the following:

- if you feel comfortable doing so, with the person who you feel is behaving inappropriately
- with your line manager
- your Human Resources Business Partner

If you have concerns about raising a complaint through these channels, you can then raise it via Speak Up.

Examples of when you might report a personal workplace grievance via Speak Up include where:

- your concerns involve systemic issues or an improper state of affairs at Quantum
- you have concerns about victimisation or wish to remain anonymous, and selecting an option from the list above will not address those concerns
- you have concerns that the person receiving your complaint will have a conflict of interest and selecting an option from the list above will not address those concerns

Speak Up should never be used in emergency situations. If you or someone you know requires emergency assistance, please contact your local emergency authorities, including police and ambulance services.

4. Speak Up for protected disclosures

Speak Up reports may relate to very serious matters including breach of laws, misconduct or an improper state of affairs. These may be 'protected disclosures' and receive 'whistleblower' protections under the law, including a right to anonymity in some countries and protection from victimisation.

Quantum has appointed the Speak Up Program (made available via a third-party provider) as an eligible recipient for receiving protected disclosures. Matters reported to the Speak Up Program are referred to Woolworths (Quantum's majority shareholder) for assessment and triage to Quantum. These matters will then be managed by Quantum in accordance with this policy and applicable whistleblower legislation. Woolworths does not typically manage matters reported to the Speak Up Program.

Please note there are alternative channels and eligible recipients for 'protected disclosures'. Please see Annexure A (for Australia), Annexure B (for New Zealand) and Annexure C (South Africa) for further information.

5. How to make a Speak Up report

	Australia - 1800 334 319	New Zealand - 0800 393 76736	India - 000 800 0501 474
For team members in other international offices - please dial +61 2 8522 9508 (international call charges apply), otherwise please use the QR code and web form below			
For team members with hearing or speech difficulties – you may contact Speak Up through the Australian National Relay Service (NRS) or New Zealand Relay			
	WoolworthsGroup.com.au/SpeakUp		

Additional support available to team members

For free, confidential, 24/7 health and wellbeing support for Quantum team members and their families, please contact the relevant Employee Assistance Program (EAP) in your region:

ANZ	Sonder 24/7 phoneline: 1800 234 561	India & South Africa	Workplace Options (Password: Quantum)
UK	Health Assured Username: wellbeing Password: TileBeamLime 24/7 phoneline: 0800 206 2547	US	Optum (Password: Insperity)

6. How we manage Speak Up matters

Confidentiality and Anonymity

When making a Speak Up report you are provided with the option to remain anonymous. If you disclose your identity, you can also ask us to keep your identity confidential or only disclose it for limited purposes. If you do identify yourself, we're committed to protecting your identity and maintaining confidentiality in line with this policy and applicable legislation (which varies depending on your location). Your identity will not be shared without your consent unless it is reasonably necessary for managing and addressing the issues raised in your report or (in limited circumstances) under applicable legislation.

In some cases, choosing to remain anonymous or to have your identity kept confidential may limit Quantum's ability to investigate and deal with the matter.

Report handling, assessment and investigation

- **Acknowledgement** - On receipt of a Speak Up report you will receive acknowledgement. You will be able to set a password that will enable you to log into a confidential portal to communicate with us, anonymously if you would prefer, and will also be able to elect to receive email notifications.
- **Assessment** - The report will be assessed by Woolworths' Group Speak Up Manager or their delegate, to determine whether the report is a protected disclosure (and whether statutory protections apply), and to triage, review, and allocate the Speak Up report to Quantum so that it is appropriately addressed and investigated.
- **Addressing your Speak Up report** - In the normal course, Speak Up reports will be investigated, as appropriate in the circumstances. Investigations will follow fair and due process, without bias. Our investigations will be conducted independently of the relevant matter disclosed and will generally allow any person against whom allegations are made an opportunity to respond. The duration of an investigation will depend on the circumstances, including the number of allegations and witnesses, amongst other factors.
- **Storing your information** - The information you provide (including your identity) will be stored confidentially and securely in access-controlled systems.
- **Communication with you** - Periodic progress updates will be provided to you, as appropriate. The nature of these updates will depend on the circumstances. For example, we will not provide information that may compromise the investigation or the disclosure of confidential information.
- **Outcome** - You will be informed when the action taken to address your report has been completed. You will receive information regarding the outcome as appropriate in the circumstances.

7. Protection from unfair treatment

Victimisation of a person because they have made a Speak Up report, protected disclosure or other complaint is **not permitted and will not be tolerated at Quantum**.

Any team member who discloses your identity inappropriately, or causes detriment, which results in victimisation and/or has adverse impacts on you, may face disciplinary action, up to and including termination.



If you feel that you have been victimised, you may raise a new Speak Up report for this purpose, or contact Quantum's Whistleblower Protection Officer (WPO) at wpofficer@quantium.com.au. The WPO is independent of the investigation process and is equipped to review or escalate your concern.

8. Speak Up governance

Quantum's General Counsel and Group Executive, People & Culture oversee the Speak Up Program and will meet at least every six months to review the effectiveness of the Speak Up Program, to ensure appropriate processes and outcomes, and make relevant recommendations.

This policy (including Annexures) is Quantum's whistleblower policy for the purposes of the Corporations Act 2001 (Cth) (Aus), the Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ), and the Protected Disclosures Act 2000 (South Africa).

Policy Changes	This policy may be changed at any time and does not form part of any team member's contract of employment.
Date approved:	August 2025
Date effective:	October 2025
Accountable:	General Counsel and Group Executive, People & Culture
Contact:	If you have any questions about this policy, please contact: Legal@quantium.com.au
Related policies:	Appropriate Workplace Behaviours and Resolution Policy
Publishing	This policy will be made available through the Quantum Internet site as well as our Confluence intranet site.

Annexure A – Legal Protections in Australia

Whistleblower protections for 'protected disclosures' - key facts

- Whistleblowers can identify and call out misconduct and improper affairs, and are provided special protections under legislation, including a right to anonymity and protection from victimisation
- Whistleblower protections apply when an 'eligible whistleblower' makes a 'disclosable matter' to someone who is 'authorised' to receive the disclosure. The information in this annexure provides further detail about these important concepts.
- If you wish to make a disclosure as a whistleblower, we encourage you to direct your disclosure to a Protected Disclosure Officer (the Chief People Officer, General Counsel or Chief Financial Officer) or a senior manager (as defined in applicable legislation). More information about how you can make a protected disclosure and how to contact our Protected Disclosure Officers are set out in this annexure.
- If you make a protected disclosure that attracts whistleblower protections, we will manage the matter in accordance with the legal requirements.
- In addition to the notes below, you can find out more information about whistleblower protections on the ASIC website [here](#).

Introduction

In Australia, you can make a "protected disclosure" if:

1. you are an "eligible whistleblower" (this is explained in Part A, paragraph 1. below);
2. you make a disclosure directly to a person or entity who is eligible to receive a protected disclosure (this is explained in Part A, paragraph 2 below); and
3. you have reasonable grounds to suspect your disclosure is about a "disclosable matter" (this is explained in Part A, paragraph 3 below).

Protected disclosures are also disclosures of information to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act 2001 (Cth) (**Corporations Act**) and applicable tax legislation (**Tax Act**).

Making a "protected disclosure" means that you will qualify for relevant legal protections under the Corporations Act or Tax Act (where applicable) from the time you make the disclosure, in addition to the protections that you would receive under this policy if you use team member Speak Up. The protections apply even if you make your disclosure anonymously, and even if you or the recipient do not recognise that the disclosure qualifies for protection. The protections also apply if your disclosure turns out to be unsubstantiated, as long as you had reasonable grounds to suspect the subject of the disclosure at the time you made it.

Note that the protections do not grant immunity for any misconduct you have engaged in that is revealed in your disclosure or subsequently discovered.

A. How do I make a protected disclosure?

The requirements for making a protected disclosure on or after 1 July 2019 under the Corporations Act or Tax Act are set out below:

1. You must be an "eligible whistleblower"

An "eligible whistleblower" who may make a protected disclosure under the Australian whistleblower laws is anyone who is or has been in respect of Quantum:

- a. an officer;
- b. an employee;
- c. an individual who supplies goods or services, and employees of suppliers (whether paid or unpaid);
- d. an individual who is an associate of the company; or
- e. either:

- in relation to the Corporations Act, a spouse or relative, dependent, or dependent of a spouse of any of the above individuals; or
- in relation to the Tax Act, a spouse, child, dependent, or spouse of a dependent, of any of the above individuals.

2. You must make the disclosure to someone authorised to receive a protected disclosure

Protected Disclosures can be made through the Quantum **Speak Up Program**. Alternatively, Quantum has appointed the following Protected Disclosure Officers:

Title	Name	Email
Group Executive, People & Culture	Natalie Jones	natalie.jones@quantium.com.au
General Counsel	Jasmine Stone	jasmine.stone@quantium.com.au
Chief Financial Officer	Brent Merrin	brent.merrin@quantium.com.au

Additional eligible recipients include:

- a. an officer or senior manager of Quantum;

Note. Officers' include a Quantum director or company secretary; A 'senior manager' is a person whose decisions affect at least a substantial part of Quantum, or have the capacity to significantly affect Quantum's financial standing.
- b. an auditor, or a member of an audit team conducting an audit, of Quantum; or
- c. an actuary of Quantum.

For disclosures under the Tax Act:

- a. any other employee or officer of Quantum who has functions or duties that relate to the tax affairs of Quantum; or
- b. a registered tax agent or BAS agent who provides tax agent services or BAS services to Quantum.

In addition, the above roles within any related body corporate of Quantum will be an eligible recipient for Protected Disclosures in relation to Quantum.

Reporting outside of Quantum

While Quantum encourages eligible whistleblowers to make disclosures internally, an eligible whistleblower may also make a protected disclosure under the Corporations Act to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA) or a prescribed Commonwealth authority.

An eligible whistleblower may also make a protected disclosure under the Tax Administration Act to the Commissioner of Taxation.

Disclosures to legal practitioners

Under the Corporations Act and Tax Act, disclosures of information to legal practitioners in order to obtain legal advice or legal representation in relation to the whistleblower provisions in that legislation may also be protected disclosures.

Public interest disclosures

There is an additional category of disclosures called 'public interest disclosures' that qualify for protection under the Corporations Act only. These can be made to journalists and members of Parliament, but only if the eligible whistleblower complies with the following strict requirements:

- a. the eligible whistleblower must have first made a qualifying disclosure under the Corporations Act to ASIC, APRA, or a prescribed Commonwealth authority;
- b. at least 90 days has passed since the qualifying disclosure was made;
- c. the eligible whistleblower does not have reasonable grounds to believe that action is being, or has been, taken to address the matters to which the qualifying disclosure related;
- d. the eligible whistleblower has reasonable grounds to believe that making a public interest disclosure would be in the public interest;
- e. after 90 days has passed, the eligible whistleblower must give the body to which the qualifying disclosure was originally made, a written notification that:
 - i. includes sufficient information to identify the qualifying disclosure; and
 - ii. states that the eligible whistleblower intends to make a public interest disclosure; and
- f. the extent of the information disclosed in the public interest disclosure is no greater than to inform the journalist or member of Parliament of the misconduct or improper state of affairs or circumstances, or other conduct falling within the scope of the Whistleblower Protection Scheme.

Emergency disclosures

There is an additional category of disclosures called 'emergency disclosures' that qualify for protection under the Corporations Act only. These can be made to journalists and members of Parliament, but only if the eligible whistleblower complies with the following strict requirements:

- a. the eligible whistleblower must have first made a protected disclosure under the Corporations Act to ASIC, APRA or a prescribed Commonwealth authority;
- b. the eligible whistleblower has reasonable grounds to believe that information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- c. the eligible whistleblower gave notice to the body to which the qualifying disclosure was made that states:
 - i. that they intend to make an emergency disclosure; and
 - ii. includes sufficient information to identify the qualifying 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.

Before making a public interest or emergency disclosure, it is important that an eligible whistleblower understands the criteria for protection under the relevant legislation.

3. Your disclosure must be about a "disclosable matter"

Only disclosures of certain types of information will qualify for protection under the Australian whistleblower laws.

Information is a "disclosable matter" under the Corporations Act if the eligible whistleblower has reasonable grounds to suspect that the information disclosed:

- a. concerns misconduct or an improper state of affairs or circumstances in relation to Quantum, in circumstances where misconduct may include:
 - i. illegal conduct by Quantum, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
 - ii. fraud, money laundering or misappropriation of funds;
 - iii. offering or accepting a bribe;
 - iv. financial misstatement or irregularities;
 - v. failure to comply with, or breach of, legal or regulatory requirements;
 - vi. engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure;
 - vii. negligence;
 - viii. breach of trust and breach of duty (not just the personal conduct of an individual); or
- b. indicates that Quantum or any employee or officer has engaged in conduct that:
 - i. constitutes an offence against, or a contravention of, a provision of any of the following:
 - The Corporations Act;
 - The Australian Securities and Investments Commission Act 2001;
 - The Banking Act 1959;
 - The Financial Sector (Collection of Data) Act 2001;
 - The Insurance Act 1973;
 - The Life Insurance Act 1995;

- The National Consumer Credit Protection Act 2009;
- The Superannuation Industry (Supervision) Act 1993;
- ii. constitutes an offence against any other law of the Commonwealth that is punishable by at least 12 months' imprisonment;
- iii. represents a danger to the public or the financial system; or
- iv. is prescribed by any regulations made under the Corporations Act.

Except in certain circumstances, personal work-related grievances will not be protected under the Corporations Act unless they relate to victimisation (see section 3 of part B below).

A disclosure is a 'personal work-related grievance' if:

- a. it concerns the whistleblower's employment and has implications for them personally; and
- b. the information:
 - i. does not have significant implications for Quantum, or another regulated entity, that does not relate to the eligible whistleblower; and
 - ii. does not concern conduct, or alleged conduct, referred to at 3(b) above of this Annexure.

Examples of personal work-related grievances that do not qualify for protection may include:

- the eligible whistleblower having an interpersonal conflict within the workplace;
- the eligible whistleblower being bullied;
- the eligible whistleblower being inadvertently underpaid once;
- the eligible whistleblower being subjected to discipline or not receiving a promotion; or
- any matters that don't have significant implications for Quantum as a whole, unless they relate to the eligible whistleblower being victimised for making a previous protected disclosure.

A personal work-related grievance may still qualify for protection if:

- it relates to a disclosable matter and a personal work-related grievance (i.e., it is a mixed disclosure); or
- the eligible whistleblower seeks legal advice or legal representation about the operation of whistleblower protections under the Corporations Act.

We still take personal work-related grievances seriously. However, they should generally be raised with a team member's line manager or HR Business Partner.

Information is a "disclosable matter" under the Tax Act if:

- a. the eligible whistleblower has reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances in relation to tax affairs of a Quantum Group company or an associate of a Quantum Group company; or
- b. the eligible whistleblower considers that the information may assist the eligible recipient to perform functions or duties in relation to the tax affairs of a Quantum Group company or an associate of a Quantum Group company.

B. What are the legal protections that apply if I make a protected disclosure?

If you have made a protected disclosure under the Australian whistleblower laws, the protections outlined in this policy will apply including the following additional legal protections:

1. Protection from Legal Action

Eligible whistleblowers who make a protected disclosure under the Australian whistleblower laws are protected from certain action in relation to having made the disclosure, including:

- any civil, criminal, and administrative (including disciplinary) action against the whistleblower; and
- contractual action, including termination of a contract on the basis that making a disclosure is a breach of that contract. Any information that is disclosed as part of a protected disclosure to either:
 - o ASIC, APRA or a prescribed Commonwealth authority, under the Corporations Act; or
 - o The Commissioner of Taxation, under the Tax Administration Act,

will not be admissible in evidence against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, except for proceedings in respect of the falsity of the information.

2. Protection of your identity

If you make a protected disclosure, and in doing so, reveal your identity (or information by which you can likely be identified), it is a legal offence for a person to disclose your identity or identify information without your consent (subject to the exceptions set out below).

If an eligible whistleblower makes a protected disclosure, it is likely that the eligible whistleblower will be asked to provide consent to the disclosure of their identity. This would be to facilitate any investigation and/or resolution of the matter. If consent is withheld, it may not be possible to adequately investigate and respond (if at all) to the disclosure.

If an eligible whistleblower does not consent to their identity being disclosed, it will still be lawful to disclose their identity to:

- ASIC, APRA, the AFP or the Commissioner of Taxation (in relation to protected disclosures under the Tax Act);
- a legal practitioner for the purposes of obtaining legal advice or legal representation about the disclosure; or
- a body prescribed by the Corporations Regulations.

It will also be lawful to disclose information (other than your identity) which you share that may lead to your identity becoming known if it is reasonably necessary in order to investigate the issues raised, in which case Quantum will take all reasonable steps to protect your identity.

ASIC, APRA or the AFP can disclose the identity of an eligible whistleblower, or information that is likely to lead to the identification of the eligible whistleblower, to a Commonwealth, State or Territory authority to help the authority in the performance of its functions or duties.

As set out in the body of the policy, disclosures can be made anonymously. Such disclosures are still capable of being protected under the Corporations Act and Tax Act.

Quantum seeks to protect the confidentiality of an eligible whistleblower's identity, including by:

- storing information about a disclosure securely;
- redacting the whistleblower's identity from relevant documents; and
- only sharing the whistleblower's identity with those who have a legitimate need to know, subject to the consent provided by the whistleblower.

3. Prohibition against victimisation

It is a legal offence for a person or a company to:

- engage in any conduct that causes, or will cause, any detriment; or
- make a threat to cause any detriment (whether express, implied, conditional or unconditional), to an eligible whistleblower or another person because the person engaging in the conduct believes or suspects that the other person or a third person made, may have made, proposes to make, or could make, a protected disclosure. This includes where such belief/suspicion was only part of the reason why the action is taken.

"Detriment" includes dismissal, disciplinary action, harassment, discrimination, property damage, reputational damage and other types of damage to a person. "Detriment" does not include administrative action that is reasonable to protect you from detriment (e.g. when the disclosure relates to wrongdoing in your immediate work area). Protecting you from detriment also does not prevent Quantum from managing unsatisfactory work performance.

Each protected disclosure is assessed upon receipt to determine the risk of detriment against you and other people mentioned in the report. Appropriate actions are taken to reduce this risk, and to ensure fair treatment of those mentioned in the disclosure, including respondents.

To protect you from the risk of detriment, eligible recipients have been trained to ensure they are aware of their responsibilities to seek to ensure your confidentiality and that you are not victimised for making the disclosure. Additionally, Quantum may, on a case-by-case basis, allow you to perform your duties from another location or in



another role at the same level, or make other modifications to your workplace or the way you perform your work duties, or reassign or relocate other staff involved in the matter.

Quantum will investigate allegations of such behaviour, and penalties and/or disciplinary action may apply for engaging in any of the conduct referred to above. Any person involved in the contravention may be found liable. If detriment is found to have occurred, Quantum may, on a case-by-case basis, allow you to take extended leave, develop an alternative career development plan, or offer compensation or other remedies.

If you believe you suffer, or are threatened with, detriment in contravention of the Australian whistleblower laws, you may:

- raise a further protected disclosure by following the steps set out above;
- raise a Speak Up report for this purpose; or
- contact Quantum's Whistleblower Protection Officer (WPO) on WPOOfficer@quantium.com.au. The WPO is independent of the investigation process, and equipped to review or escalate your concern.

Court Orders

Courts are given broad scope to make orders remedying a detriment or threatened detriment. These include injunctions, compensation orders (including against individual employees and their employer), reinstatement, exemplary damages and the making of apologies. Civil and criminal sanctions also apply to breaches of the Corporations Act and Tax Act.

C. Handling and investigating a disclosure

Subject to the requirements of the Corporations Act and the Tax Act, protected disclosures will be investigated in the same way as other reports made under this policy. The timeframe for investigations of protected disclosures will be different depending on the nature and scope required. However, Quantum's intent is to complete an investigation as soon as practicable.

Where appropriate, Quantum will report the findings of an investigation to the General Counsel. The method of documenting and reporting the findings of an investigation will depend on the nature of the disclosure and the circumstances. Reporting of the findings will have regard to applicable confidentiality requirements.

Annexure B – Legal Protections in New Zealand

New Zealand has its own whistleblower legislation, the *Protected Disclosures (Protection of Whistleblowers) Act 2022 (PDA)*, which outlines how your disclosure of information may qualify as a 'protected disclosure' and what additional legislative protections you will receive if you make a protected disclosure in New Zealand.

Can I make a protected disclosure?

You can make a protected disclosure about Quantum under the PDA if you are (or were formerly):

- an employee of Quantum;
- a person seconded to Quantum;
- an individual engaged by or contracted under a contract for services to do work for Quantum;
- an individual who is concerned in the management of Quantum; or
- a volunteer working for Quantum; each being a "Discloser".

Will my disclosure be protected under the NZ Legislation?

A disclosure of information is a "protected disclosure" under the PDA if the Discloser:

- believes on reasonable grounds that there is, or has been, serious wrongdoing in or by Quantum; and
- discloses information about that in accordance with the PDA; and
- does not disclose it in bad faith.

"Serious Wrongdoing" includes any act, omission or course of conduct in or by Quantum that is one or more of the following:

- an offence;
- a serious risk to public health, public safety, the health or safety of any individual or the environment;
- a serious risk to the maintenance of law, including the prevention, investigation and detection of offences and the right to a fair trial;
- an unlawful, corrupt, or an irregular use of public funds or public resources.

How can I make a protected disclosure?

To make a protected disclosure within Quantum, you must disclose information in the manner outlined by Quantum in this policy.

Protected Disclosures can be made through the Quantum's Speak Up Program.

Alternatively, the following individuals have been appointed as protected disclosure recipients for Quantum Group New Zealand Pty Limited for the purposes of the PDA:

Title	Name	Email
Group Executive, People & Culture	Natalie Jones	natalie.jones@quantum.com.au
General Counsel	Jasmine Stone	jasmine.stone@quantum.com.au
Chief Financial Officer	Brent Merrin	brent.merrin@quantum.com.au

A Discloser can also make a protected disclosure to an appropriate authority at any time, including in circumstances where the Discloser has also made a protected disclosure to Quantum or another appropriate authority.

What are the protections that apply if I make a protected disclosure?

If you have made a protected disclosure in New Zealand, then you will be afforded the protections under this policy and in the PDA:

1. General protections

A Discloser is entitled to protection under the PDA for a protected disclosure made to their organisation or to an appropriate authority even if:

- they are mistaken and there is no Serious Wrongdoing; or
- they do not indicate that the disclosure is being made under the PDA;
- they technically fail to comply with sections 11 or 14 of the PDA (as long as they have substantially complied); or
- they also make the disclosure to another person, so long as they do so on a confidential basis and for the purposes of seeking advice about whether or how to make a protected disclosure in accordance with the PDA.

Protected disclosures must not contain information that is known to be untrue. Deliberate false reports of information that a team member knows to be untrue will not qualify for protections under this policy or the PDA.

2. Protections against retaliation, less favourable treatment and victimisation

Disclosers are not to be subject to retaliation, less favourable treatment or victimisation because the Discloser intends to make or has made a protected disclosure under the PDA. Where a Discloser experiences retaliation or victimisation upon disclosing a protected disclosure, they may have grounds to raise a personal grievance under the Employment Relations Act 2000 or bring an action under the Human Rights Act 1993 (as applicable). In addition, a Discloser may seek recourse under privacy laws, depending on the circumstances.

Retaliation includes (in relation to an employee) dismissal, refusing or omitting to offer or afford the employee the same terms of employment, conditions of work, fringe benefits, or opportunities for training, promotion, and transfer as are available to other employees of the same or substantially similar qualifications, experience, or skills employed in the same or substantially similar circumstances, being subject to detriment or disadvantage in circumstances which other employees employed in work of that description are not or would not be subjected to detriment or disadvantage, or retiring an employee (including requiring or causing the employee to retire or resign), or organising to do any of these things.

Victimisation is where a person (or a relative or associate of that person) receives actual or threatened unfavourable treatment (compared to other persons in the same or substantially similar circumstances) connected with making, intending to make, encouraging, giving information in support of, declining to do an act that would contravene the PSA or otherwise doing anything under or by reference to the PDA a protected disclosure (provided that disclosure is not a knowingly false allegation or otherwise made in bad faith).

3. Immunity from civil, criminal and disciplinary proceedings

Where you have made or referred a protected disclosure, the PDA prevents civil, criminal or disciplinary proceedings being taken against you for the reason that you made or referred a Protected Disclosure.

4. Confidentiality

The PDA requires protected disclosures to be kept confidential. Every receiver of a protected disclosure must use their best endeavours to keep confidential information that might identify the Discloser, unless:

- the Discloser consents to the disclosure of the identifying information; or
- there are reasonable grounds to believe that disclosure of that identifying information is essential:
 - for the effective investigation of the Protected Disclosure;
 - to prevent a serious risk to public health, public safety, the health or safety of any individual or the environment;
 - to comply with the principles of natural justice; or
 - for an investigation by a law enforcement or regulatory agency for the purpose of law enforcement.

Any disclosure of identifying information will be managed in accordance with Quantum's obligations under law, including the PDA and Privacy Act 2020.

Annexure C – Legal Protections in South Africa

1. Scope and interpretation

This South African specific addendum (this **Addendum**) to the Quantum Team Member Speak Up and Protected Disclosure Policy includes provisions applicable to Quantum team members in South Africa.

For the avoidance of doubt, the provisions of the policy shall remain applicable to team members in South Africa, and such provisions must be read in conjunction with this Addendum. If, however, there is a conflict between the provisions of this Addendum and those of the policy regarding whistleblowing processes and/or protections in South Africa, this Addendum shall take precedence over the policy.

2. Application

For purposes of ensuring compliance with the South African Protected Disclosures Act, 26 of 2000 (the **SA PDA**), a Quantum “team member” in terms of the policy shall include both:

- **employees**, meaning (a) any person, excluding an independent contractor, who works or worked for Quantum, and who receives or received, or is entitled to receive, any remuneration; and (b) any other person who in any manner assists or assisted in carrying on or conducting the business of Quantum; and
- **workers**, meaning (a) any person who works or worked for Quantum; (b) any other person who in any manner assists or assisted in carrying on, or conducting, or conducted, the business of Quantum or is clients, as an independent contractor, consultant or agent; or (c) any person who renders services to Quantum while being employed by a temporary employment service.

3. What can you use Speak Up for

The Speak Up Program can be used by a “team member” to disclose any information regarding any conduct of a Quantum entity, or of an employee or a worker of a Quantum entity, where that “team member” has reason to believe that the information concerned shows, or tends to show, a failure to comply with Quantum’s policies, values or applicable laws.

In addition to the examples set out in the policy, examples of conduct for which the Speak Up Program may be used include:

- that a criminal offence has been committed, is being committed, or is likely to be committed;
- that a person has failed, is failing, or is likely to fail, to comply with any legal obligation to which that person is subject;
- that a miscarriage of justice has occurred, is occurring, or is likely to occur;
- that the health or safety of an individual has been, is being, or is likely to be, endangered;
- that the environment has been, is being, or is likely to be, damaged;
- unfair discrimination, as contemplated in the Employment Equity Act, 1998 or the Promotion of Equality and Prevention of Unfair Discrimination Act, 2000; or
- that any matter referred to above has been, is being, or is likely to be, deliberately concealed.

(collectively referred to as a **SA PDA Disclosure**).

Nothing in the policy or this Addendum should be construed as requiring team members to make a disclosure via the Speak Up Program.

Team members who knowingly make false reports may not only be subject to disciplinary action (the consequences of which may include dismissal) as set out in the policy, but may also be guilty of an offence and subject to criminal proceedings in terms of the SA PDA.

4. Will my disclosure be protected?

Yes. In addition to the protections outlined in the policy, where a disclosure constitutes a SA PDA Disclosure, and is made in good faith, it will also enjoy protection in terms of the SA PDA.

Practically, this means that, in addition to protection from victimisation as outlined in the policy, team members will also be protected against an occupational detriment. For purposes of this Addendum, an **occupational detriment**, in relation to a team member, means:

- being subjected to any disciplinary action;
- being dismissed, suspended, demoted, harassed or intimidated;
- being transferred against their will;
- being refused transfer or promotion;
- being subjected to a term or condition of employment or retirement which is altered or kept altered to their disadvantage;
- being refused a reference, or being provided with an adverse reference, from Quantum;
- being denied appointment to any employment, profession or office;
- being subjected to any civil claim for the alleged breach of a duty of confidentiality or a confidentiality agreement arising out of the disclosure of: (a) a criminal offence, or (b) information which shows or tends to show that a substantial contravention of, or failure to comply with the law, has occurred, is occurring, or is likely to occur;
- being threatened with any of the actions referred to above; or
- being otherwise adversely affected in respect of their employment, profession or office, including employment opportunities, work security and the retention or acquisition of contracts to perform work or render services.

Further, and in addition to the right to refer another Speak Up report, team members may also have the right to approach any court having jurisdiction, including the Labour Court or the Commission for Conciliation, Mediation and Arbitration.

5. Report handling, assessment and investigation

Notwithstanding the policy, in accordance with the SA PDA, on receipt of a report Quantum may decide not to investigate the matter, in which case the team member will be notified accordingly.

All investigations conducted in accordance with the policy will comply with the notification requirements and timelines as prescribed in terms of the SA PDA.