

Policy/Procedure

Whistleblower Policy

This Policy applies to:

All ZEN Energy Employees and Contractors

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Purpose

ZPH Investments Pty Ltd (“ZEN Energy”) and its management are committed to conducting its business ethically, with integrity, and in compliance with all applicable laws. It is vitally important that all employees are able to report any conduct they believe may be improper without the fear of retribution or any form of reprisal and as such we are committed to providing a safe and supportive speak up culture where our people can be their best. We are committed to maintaining the highest standards of ethical behavior and conduct at all times.

The purpose of this policy is to encourage and support the reporting of actual and suspected wrongdoing and misconduct. No policy can anticipate every possible situation that might arise. Employees are encouraged to discuss with their managers, ZEN Energy’s P&C staff or Company Secretary any question about specific facts and circumstances that may relate to provisions of this Policy.

Our Values

We approach our business activities in a spirit of open and honest communication, seek out genuine collaboration and strive for excellence in everything we do.

Policy

All employees are encouraged to report any conduct they consider may amount to Improper Conduct. This includes matters they believe contravene:

- Relevant company codes, policies, and procedures; including code of conduct, confidentiality, conflict of interest, EEO, discrimination, sexual harassment, bullying, privacy, grievance in the workplace and/or
- The law

We encourage you to speak up and report any actual or suspected issues of wrongdoing or misconduct. We are committed to fostering a safe speak up culture and we will protect you when you speak up.

You can choose to provide your details or remain anonymous, and, in all circumstances, we will treat your identity, and the information you provide, in the strictest of confidence. We will only share your name and the information you provide with your consent or if the law requires it.

How to speak up

If an employee becomes aware of any matter or behavior that may amount to wrongdoing or improper conduct, they should report it to:

Email:

speakup@coreintegrity.com.au

speakup@zenenergy.com.au

Phone: 1800 324 775

Mail:

Attention: Zen Energy Speak Up

PO Box 730

Milsons Point NSW 1565

These channels are overseen and managed by an independent third party and whistleblowers can remain anonymous.

Who to speak up to

We encourage you to speak up and disclose any suspected or actual wrongdoing or illegal activity via our independent and externally managed Whistleblower Hotline which is provided by an independent third party as this enables ZEN to provide the best possible reporting experience to our people and importantly, to ensure that we can protect you as promised.

To qualify for protection as an 'eligible whistleblower' you are required to make a report of 'reportable conduct' to an 'eligible recipient'. Our external Whistleblower Hotline provider, Core Integrity, is an eligible recipient.

ZEN has a number of additional eligible recipients to whom you can make your report should you wish; these are:

- A Board Member of ZEN
- People & Culture Manager - Craig Brooks
- Company Secretary - Glenn Garnaut
- Chief Financial Officer - Phillippa Chen
- The Whistleblower Protection Officer (WPO);
- The Whistleblower Investigations Officer (WIO); or
- ZEN's external Whistleblower Hotline provider Core Integrity Pty Ltd.

You can also make a disclosure of reportable conduct to a member of parliament or a journalist in exceptional or 'emergency' situations. However, we encourage you to make your report to the independent third party where practicable in the first instance.

What disclosures are protected?

You are encouraged to speak up if you have reasonable grounds to suspect any misconduct, wrongdoing or illegal conduct involving ZEN, its subsidiaries or employees. This includes any breaches of the law, our Code of Conduct or anything else you feel may be impacting ZEN, its employees, customers, or stakeholders. Making a report under this policy may be considered as 'reportable conduct'.

Reportable Conduct may include:

- Fraud, theft or dishonest conduct (including falsification of records);
- Bribery, corruption, money laundering or secret commissions;
- Illegal, unethical or improper conduct (drug use, violence, criminal damage);
- Breach of employment, labour or workplace health and safety or any other laws;
- Conduct that damages our reputation or brand or relationships with third parties;
- Breach of an internal policy (e.g. Code of Conduct or Conflicts of interest);

- Breaches of confidentiality and disclosure of confidential information;
- Representing a danger to the public or the financial system;
- Any other inappropriate behavior, misconduct or improper state of affairs;
- An offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; and
- Prescribed by regulations under the Corporations Act, 2001.

Reportable Conduct does not include personal work-related grievances. Personal work-related grievances include, but are not limited to, interpersonal conflicts between employees, work performance issues, or a decision relating to the engagement, transfer, or promotion of an employee.

Personal work-related grievance will be dealt with through ZEN's Grievance Policy.

How reporters are protected

ZEN is committed to protecting anyone that speaks up by:

- **Protecting your identity:** we will not share your identity, or information that is likely to lead to your identity being known, unless you give your consent, or it's allowed by law. We will always ask for your consent before disclosing your identity or any of the information you provide to another party;
- **Ensuring Fairness:** we are committed to ensuring you are treated fairly and that you are not disadvantaged or discriminated against as a result of speaking up. We will assess your report and take all reasonable and appropriate actions to consider, investigate and resolve the issues raised. Each report will be treated on its own merits in terms of the appropriate action or response but in all circumstances, we are committed to ensuring fairness to all parties involved;
- **Providing Support:** we understand and acknowledge that speaking up can be difficult and we are committed to providing support to you, and any other impacted party, throughout the process. As part of that commitment, you will have access to ZEN's Whistleblower Protection Officer (WPO). Our WPO is responsible for ensuring protections under this policy are enforced and maintained.

If you have any questions or concerns regarding the protections that apply to you, and the support being provided, you are encouraged to contact the Whistleblower hotline.

Confidentiality and anonymity

You can choose to remain anonymous or reveal your identity when speaking up and making a protected disclosure. If you wish to remain anonymous, we encourage you to submit your report via our secure online reporting platform. You will be provided with your own unique Report ID and password, and you are encouraged to utilize the platform for secure, two-way communications.

If you submit a report via our online reporting channel, and choose to remain anonymous, you can elect to receive updates on your report, provide more information and check on the status of your report by supplying your email address.

Should you supply your email address, it will not be accessible or visible to anyone from within ZEN or the independent and external provider, thereby providing you with true anonymity.

This enables you to communicate safely and securely with those who are responsible for reviewing or investigation your report whilst remaining anonymous.

Report Handling and investigation process

Upon receipt of a report, our external independent service provider will assess the report and obtain as much information as possible. All information will be documented and contained in our secure online reporting platform to ensure we can maintain confidentiality of your report and protect your identity.

The external independent service provider team will take the time required to build rapport, display empathy, and elicit the appropriate amount of information from you. The more information you can provide during the reporting process the better, as this will enable ZEN to make an informed and considered assessment of the most appropriate response once the external independent service provider refers the report to us.

You will be provided access to your report through the independent service providers secure reporting platform with your own unique Report ID and password and you are encouraged to utilize the platform for secure, two-way communications.

Upon receipt of the report from the independent service provider, ZEN will assign the report to the most appropriate person based on the issue being raised. In doing so, your report will be further assessed to determine if it qualifies as a protected disclosure. All protected disclosures are assessed by our Whistleblower Investigations Officer (WIO) and are provided to our Whistleblower Protections Officer (WPO).

Depending on the issue being raised, an investigation may be required. If an investigation is required, the Whistleblower Investigation Officer (WIO) will be responsible for overseeing or conducting the investigation whilst the Whistleblower Protection Officer (WPO) will be your point of contact for ensuring you are protected and supported throughout the process.

In some cases, the WIO may appoint an external investigator to undertake an investigation on our behalf. The duration of a formal investigation will depend on the circumstances including the number of allegations, witnesses, and other factors.

You can receive updates, provide more information, and ask questions regarding your report and the investigation by contacting the WIO, WPO or investigator via the secure online reporting platform.

Application of this Policy

This policy relates to ZEN and its subsidiaries and applies to all current former employees, directors (officers), consultants and third parties (suppliers) and their employees as well as the relatives, spouses, and dependents of those individuals.

A person who speaks up to report wrongdoing or misconduct under this policy is known as an eligible whistleblower. An eligible whistleblower has legal rights under the Corporations Act and other legislation (tax laws). This policy does not override those rights.

It applies to all activities anywhere in the world.

All ZEN Energy staff are required to read, understand, and comply with this policy and to follow the requirements set out in this policy or in any relevant operational policies or procedures.

Amendments to this Policy

This policy must be reviewed annually by the Chief Governance Officer and can only be amended with approval of the Board.

Vexatious Reports

Whistleblowing is about reporting real or perceived Improper Conduct. A report may damage the career prospects and reputation of people who are the subject of serious allegations and therefore if the employee's report is found to be deliberately misleading or vexatious, in that the Whistle blower did not have reasonable grounds to suspect that the information would indicate Improper Conduct, the Whistle blower may be subject to disciplinary proceedings, including summary dismissal.

Protected Disclosure Officers

Position	Name (as at the date of this policy)
People & Culture Manager	Craig Brooks
Company Secretary	Glenn Garnaut
Chief Financial Officer	Phillippa Chen

The Protected Disclosure Officers named above includes any person appointed to this role since this policy was last published, any person acting in this role, or a representative of the Protected Disclosure Officer as nominated in writing by the Protected Disclosure Officer

Amendment History

Prepared by	Authorised By	Version Number	Issue Date	Notes
Chief Risk Officer	CEO	1	1/7/21	Approved by the Board 31/8/21
Chief Risk Officer	CEO	2	1/7/22	Minor changes to legal entity references
Chief Risk Officer	Approved by the Board – 28/11/2023	3	28/11/2023	Revised with new independent whistleblower hotline