

Whistleblowing Policy

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| Coverage | All Iress People plus vendors, suppliers and consultants |
| Geographic scope | Global |

1. Introduction

This policy explains how to confidentially report any suspected wrongdoing at Iress and outlines the protections and processes in place to support you.

Iress encourages disclosures of suspected wrongdoing. If you have a concern about conduct at Iress which you reasonably suspect is illegal, unethical, hazardous, or improper, you should feel confident about raising concerns internally or externally.

Iress has established reporting and investigative mechanisms which are objective, confidential and independent.

The purpose of this policy is to outline:

- the discloseable matters and who can make a disclosure;
- who can receive a disclosure;
- how to make a disclosure;
- legal protection and support for disclosers;
- handling and investigating a disclosure; ensuring fair treatment of parties;
- ensuring this policy is easily accessible and understandable

2. Who can whistleblow?

Any one can make a report of suspected whistleblowing under this policy.

Whistleblowing protections vary by jurisdiction (refer to your local annexure for full list of persons eligible for protections).

Current Iress employees are provided with protections in all jurisdictions in which we operate.

3. What is suspected wrongdoing?

Suspected wrongdoing covers serious issues like illegal, unethical, or hazardous behavior, while personal workplace grievances should be reported under the separate Grievance Policy

In this policy, we use the term 'suspected wrongdoing'¹. Suspected wrongdoing is a reasonable belief that an individual, or entity, has engaged in conduct that is illegal, unethical, hazardous or a violation of Iress policy. Examples of wrongdoing may include:

¹ This term serves as the equivalent to Disclosable Matters (Australia), Qualifying Disclosures (UK), Serious Wrongdoing (New Zealand), Irregular Conduct (South Africa), Improper Conduct (Singapore), and Wrongdoing (Canada).

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| 1 | Illegal activities (e.g., money laundering, insider trading, drug use, or violence). |
| 2 | Corrupt behaviour (e.g., bribery or dishonestly taking advantage of a position). |
| 3 | Bullying, harassment, targeting of people based on their race, religion or gender. |
| 4 | Breaches of taxation law and/or misconduct relating to tax affairs |
| 5 | Improper financial practices (e.g. accounting, controls, tax or financial reporting). |
| 6 | A significant or serious threat to health or safety, or danger to the environment. |
| 7 | Serious or systemic breaches of Iress policy |
| 8 | Concealing or attempting to conceal any of the above conduct. |
| 9 | Retaliation (or threats) against a person who raises concerns under this policy |

A complaint relating to an individual's own personal circumstances, such as a workplace grievance, does not typically qualify as a whistleblowing disclosure. Workplace grievances should be raised under the Grievance Policy. If unsure whether a concern is a grievance or a whistleblowing matter, contact a Nominated Officer or Your Call for guidance. Iress treats both matters with seriousness and confidentiality.

4. Reporting suspected wrongdoing

Iress supports the prompt reporting of any suspected wrongdoing. Reporting does not need conclusive evidence. Reporting requires a "reasonable grounds to suspect" that the information provided is true at the time of disclosure. This could include direct evidence as well as suspicions, concerns, or outcomes, even if the underlying facts are not yet fully proven. Requirements vary by jurisdiction. Refer to your local annexure for details².

Any disclosure made in good faith is protected by the policy, and in some jurisdictions, specific legal protections also apply. Iress will acknowledge receipt of a disclosure within 21 days.

Iress takes all reports of suspected wrongdoing seriously. A whistleblowing disclosure initiates:

- An Investigation into the alleged wrongdoing.
- A series of protections for the whistleblower.
- A strict and enforced confidentiality requirement among investigators and all involved parties.

Whistleblowers have the right to remain completely anonymous throughout reporting and investigation, including the ability to refuse to answer questions that may reveal their identity. A decision to remain anonymous can make it harder to investigate alleged wrongdoing.

Iress has multiple channels in which suspected wrongdoing can be formally disclosed. The channel by which that suspected wrongdoing is disclosed to Iress is at the discretion of the person making the disclosure, although Iress does have a preferred channel (Your Call). The channel in which a disclosure is made will not impact the investigation or outcome.

There are three channels available to make disclosures. Details and contact details are below:

² Singapore does not have whistleblowing legislation, but relies on various laws and regulations including the Prevention of Corruption Act (PCA), SGX Listing Rules and Code of Corporate Governance. The term "informer" is used in the PCA and "Improper conduct" is used in the SGX Listing Rules.

Your Call: an external, independent provider that provides confidential reporting and management of whistleblower concerns

| Your Call ³ | | | |
|---|--------------------------|--------------------------|-------------------------|
| AU: 1300 790 228 | UK: 0800 046 5662 | SGP: 800 492 2390 | SA: 1300 790 228 |
| NZ: 0800 492 2930 | CAN: 1800897 2861 | US: 1800 897 2761 | |
| www.yourcall.com.au/iress (click on 'Make a Report'). | | | |

Nominated whistleblowing officers: senior, trained leaders at Iress who manage and oversee whistleblowing disclosures at Iress as listed below. You can make a report in person, in writing, verbally or by telephone directly to any of the people listed below as well as any director of Iress Limited.

| Nominated Whistleblowing Officer(s) | |
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| Aimee Yi <i>(General Counsel APAC; Nominated Whistleblowing Officer)</i> aimee.yi@iress.com | Rebecca Kelly <i>(General Counsel EMEA; Alternate Nominated Whistleblowing Officer)</i> rebecca.kelly@iress.com |

External regulators, competent authorities and legal practitioners: Refer to your country-specific annexure for further details of the external regulators to whom a disclosure can be made in your jurisdiction. Disclosures to legal practitioners for the purposes of seeking advice about whistleblowing provisions may also be protected.

5. What Happens When You Report

Once a disclosure is made, with your consent, your concern will be forwarded to the Nominated Whistleblower Officer (or Alternate) who will coordinate the investigation.

The purpose of the investigation is to determine whether or not your disclosure of suspected wrongdoing is substantiated.

- Investigation processes will vary depending on the precise nature of the conduct being investigated, and will be undertaken by an appropriately qualified member of staff separate from the person(s) who made the disclosure and person(s) the allegation concerns.
- In certain circumstances, external investigators may be appointed and law enforcement notified.

The investigation will be thorough, objective and fair. Investigations will determine the facts and may include interviews, document reviews, data assessment, electronic file review, file audits, and forensic analysis.

Iress will take all reasonable steps to ensure that any employee who is the subject of suspected wrongdoing is afforded fair treatment and an impartial investigation. Generally, before an investigation is conducted, employees who are the subject of suspected wrongdoing may be, within the constraints of confidentiality and ensuring the whistleblower's identity is not revealed in the process:

- told about the substance of the allegations;
- given a fair and reasonable opportunity to respond to the allegations before the investigation is finalised; and

³ If you are deaf or have a hearing or speech impairment, you can contact Your Call online. If you would like to contact Your Call by phone in Australia, you can do so through the National Relay Service. Simply choose your contact method at www.relayservice.gov.au and request Your Call's hotline 1300 790 228.

- informed of the findings of the investigation and given an opportunity to respond to those conclusions before any action is taken against them (subject to legal, privacy and confidentiality requirements).

Where possible we will aim to keep the person making the disclosure informed of the progress of the investigation and its outcome. However, sometimes the need for confidentiality may prevent this.

Before providing any information to an employee who is the subject of suspected wrongdoing we will ensure:

- The information does not include the identity of the person(s) making a disclosure;
- Iress has taken all reasonable steps to reduce the risk that the person making the disclosure will be identified from the information; and
- Only information reasonably necessary for investigating the disclosure is provided.

Employees who are the subject of suspected wrongdoing may access Iress's independent Employee Assistance Program (EAP) for additional support.

6. How You Are Protected

Iress is committed to protecting all individuals who report concerns on reasonable grounds, regardless of whether the concerns are ultimately substantiated. Detrimental conduct in many jurisdictions is prohibited by the law and attracts civil and/or criminal penalties.

Whistleblowers must not suffer any retaliation or detrimental treatment as a result of raising a concern.

Iress will not tolerate any form of actual or threatened retaliation against any person who raises a concern, including:

- Dismissal, suspension, demotion, or involuntary transfer, or threats to do so.
- Harassment, bullying, intimidation, or threatening behaviour.
- Discrimination, bias, or having your authority undermined.
- Harm, including psychological harm, or damage to your property, reputation, or financial position, or threats to do so.
- Unfavourable treatment connected with raising a concern.

For disclosures that qualify for protection under relevant whistleblowing legislation, the person whistleblowing is also afforded specific civil and criminal immunities.

7. Wellbeing

Iress is committed to supporting the wellbeing of any person who makes a disclosure, is the subject of a disclosure, or an investigator, witness, or any other involved party.

Iress will take reasonable steps to provide appropriate support, which may include access to Iress's Employee Assistance Program (EAP), consideration of work modifications or leave where appropriate, and communication and updates via appropriate channels.

8. Requirements on investigators, witnesses and any other involved party

All parties involved in a whistleblowing matter, including whistleblowers, investigators, witnesses, and any other person privy to the information, must maintain strict confidentiality regarding the report and the investigation.

Information is only to be shared on a strict 'need-to-know' basis. It must not be discussed with any unauthorised person, including colleagues, family, or external parties. For the avoidance of doubt, that includes the sharing of information among peers, leadership team members and between directors.

Spreading rumour or gossip, or engaging in speculation about the subject matter of a report or investigation, is a breach of this confidentiality requirement.

Providing false, misleading, or fabricated information to an investigator is considered serious misconduct and may result in disciplinary action.

9. Enforcement and Failure to Comply

In many jurisdictions, engaging in retaliation or breaching anonymity protections is prohibited by law. Iress may refer cases to law enforcement.

False and malicious reporting will be treated seriously. If Iress finds that anyone has intentionally made a false report, Iress may take disciplinary action.

Any breach of this policy can result in severe disciplinary action, up to and including immediate termination of employment.

10. Reporting to the Board

The Board (via the Audit and Risk Committee) will be provided with confidential reports on the number and type of whistleblowing incidents periodically to enable it to address any issues at a jurisdictional or group level.

The Audit and Risk Committee will be provided with additional information about any material incidents raised. Reports will be on a “no names” basis to maintain the confidentiality of matters raised under this policy.

The Audit and Risk Committee will monitor the whistleblower management system to ensure that the broader trends, themes and/or emerging risks highlighted by the disclosures made under this policy are addressed and mitigated as part of Iress’s risk management and corporate governance.

11. How This Policy is Made Available

Iress Whistleblower Policy is published and accessible on the Iress Intranet, via Iress external website, and its existence is noted to all new employees during onboarding. All employees and officers are periodically reminded of its existence, and a copy is available on request.

The policy is easily accessible via Iress's external website. It will be reviewed periodically to ensure it remains current and compliant.

All employees undergo mandatory training in Litmus.

12. Records

Iress maintains a confidential record of all whistleblowing incidents and the actions taken, stored under strict security in a central repository.

13. Local annexure

Iress has local annexures outlining additional statutory requirements for whistleblowing.

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| Australia | Annexure 1 | South Africa | Annexure 3 | Singapore | No legislation |
| UK | Annexure 2 | Canada | Annexure 4 | New Zealand | Annexure 5 |