



Whistleblower Policy

November 2025

Version 2.0



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1 Introduction

1.1 Purpose of MLPL's Whistleblower Policy

In accordance with Marinus Link Pty Ltd's (**MLPL**) Statement of Expectations, MLPL is committed to:

- conducting its activities legally, ethically and with integrity and accountability; and
- managing and using the resources entrusted to it responsibly and in a manner that is efficient, effective, economical, and ethical.

An essential component of meeting these commitments is ensuring that individuals are empowered to come forward and report concerns (called a **disclosure** in this policy). This policy sets out how individuals who wish to make a disclosure can do so and the legal protections that may be available under the applicable state and federal laws that apply to disclosures relating to MLPL.

MLPL is committed to protecting those who make disclosures (**whistleblowers**) as part of the disclosure process as described in this policy.

Our people should read this policy in conjunction with MLPL's Respectful Workplace Interactions Policy, Respectful Workplace Interactions Procedure and Issues and Complaints Resolution Procedure.

2 Who does this Policy apply to?

This policy applies to all MLPL directors, officers, employees and contractors in organisation chart roles (**our people**).

This policy also applies to those members of the public who are able to make disclosures under the applicable laws (see section 3 for further information).

3 Key elements of this policy

3.1 Purpose

The purpose of this policy is to outline MLPL's approach to whistleblowers who come forward with concerns, including disclosures made under the Public Interest Disclosures Act 2012 (Vic) (**PID Act**), the Corporations Act 2001 (Cth) (**Corporations Act**) and the Tax Administration Act 1953 (Cth) (**Tax Act**).

MLPL recognises the importance of robust whistleblower processes to:

- **Deter** wrongdoing.
- **Encourage** our people to speak up when wrongdoing is suspected or observed.
- **Listen** to our people by providing appropriate channels for our people to report wrongdoing.
- **Protect** and **support** our people by protecting those who report wrongdoing from detriment.
- **Create** a culture of compliance and transparency and safety (including psychological safety) shared by all our people.

3.1.1 State and Federal regimes

A disclosure made under the PID Act (the **State regime**) or the Corporations Act or Tax Act (the **Federal regime**) will be managed by MLPL in accordance with **Appendix A** of this policy.

The State regime and the Federal regime operate separately and have different processes for whistleblower reports.

While there may be some overlap in the types of matters that could be disclosed, it is important that any potential whistleblower reviews the simple guidance in **Appendix A** prior to making a disclosure to ensure that their disclosures qualify for the legal protections (if applicable) available to whistleblower, including identity protection and protections against reprisal or detriment. Further details can be found in **Appendix A**.

3.1.2 Assistance

MLPL encourages anyone who is aware of any potential wrongdoing at MLPL to speak up.

MLPL recognises that navigating the Federal and State regimes may be difficult. MLPL will support any concerned potential whistleblower to navigate the whistleblower process.

If you have any concerns or are unclear about the processes or protections available, you are encouraged to contact:

- Nicholas Aird, General Counsel and Company Secretary: nicholas.aird@marinuslink.com.au; or
- Prajit Parameswar, Chief Financial and Commercial Officer: prajit.parameswar@marinuslink.com.au; or
- Sandra Gamble (Chair): sandra.gamble@marinuslink.com.au,

who are also eligible recipients of disclosures under the Federal regime (see **Appendix A** for further details).

3.1.3 Support available to whistleblowers

MLPL supports all whistleblowers by:

- complying with all requirements of the applicable Federal and State regimes;
- providing confidential and accessible methods to make disclosures, including anonymously (see further information in **Appendix A**);
- providing support to navigate the dual Federal and State whistleblower regimes;
- treating all disclosures with the confidentiality required by the applicable laws, including in relation to any investigation materials or documentation related to the disclosure;
- provide appropriate updates and support to all whistleblowers as legally permitted and appropriate in each circumstance, including through taking steps to monitor the discloser's welfare (including their psychological welfare);
- protecting any potential whistleblower from victimisation and other detrimental action; and
- promptly reviewing and investigating all disclosures with due consideration to confidentiality, impartiality and procedural fairness.

3.1.4 Procedural Fairness

MLPL acknowledges that any persons the subject of a disclosure are entitled to procedural fairness in the course of any investigation and any subsequent actions (if any). Such procedural fairness includes:

- treating the disclosure and any investigation confidentially (subject to applicable laws);
- ensuring an objective, fair and independent investigation process, and regular updates regarding the progress of investigation, provided this is permitted taking into account confidentiality and applicable laws;
- ensuring that all of our people are afforded the opportunity to reply to any allegations or proposed adverse findings made against them, and have sufficient information to understand those allegations or findings and be able to respond; and
- if the whistleblower is an employee or contractor of MLPL, access to MLPL's employee assistance services.

3.2 Whistleblower hotline

In conjunction with KPMG, MLPL has established an anonymous FairCall whistleblower service that is accessible via a toll free telephone hotline, KPMG's website or Australia Post.

Telephone hotline: 1800 500 965

FairCall Website: <https://www.kpmgfaircall.kpmg.com.au/Marinus>

Australia Post: The FairCall Manager, KPMG Forensic, PO Box H67, Australia Square, Sydney NSW 1213

Within 24 hours of receiving a disclosure, KPMG will send a report to MLPL providing details of the information reported and anything that may be pertinent to a subsequent investigation.

The whistleblower's identity will not be revealed unless they have chosen not to remain anonymous.

4 Need to know more or have a question?

All MLPL employees will have access to this policy on MLPL's document management system (The Link). Support and further information are available from your manager or the Governance and Compliance Team, and from the persons listed in section 3.1.2 (*Assistance*) of this policy.

5 Compliance

All our people are responsible for complying with this Policy and any breaches will be treated seriously and may result in disciplinary action (including termination for serious non compliances) or contractor performance management.

6 Administration of this policy

This Policy is administered by MLPL's Governance and Compliance team and will be reviewed and approved every two years or updated where applicable.



Stephanie McGregor

21 November 2025

Chief Executive Officer

Marinus Link Pty Ltd

APPENDIX A – Overview of making disclosures under the State and Federal regimes



Federal (Commonwealth Whistleblower) regime	State (Victorian Public Interest Disclosure) regime
1. Overview of the disclosure process (Refer to the specific section below for further details)	
<p>To be protected, you need to be:</p> <ul style="list-style-type: none"> • An eligible whistleblower (see <i>section 2</i>); • Making a disclosure about certain things (see <i>section 3</i> and the examples in <i>section 4</i>); and • To the right person at MLPL or the right body (see <i>section 5</i>). <p>If you meet the above requirements, you will receive certain protections under the law (see <i>section 6</i>).</p> <p>You can do so anonymously (see <i>section 7</i>).</p>	<p>To be protected, you need to be:</p> <ul style="list-style-type: none"> • Anyone (see <i>section 2</i>); • Making a disclosure about certain things (see <i>section 3</i> and the examples in <i>section 4</i>); and • To the right body (see <i>section 5</i>). <p>If you meet the above requirements, you will receive certain protections under the law (see <i>section 6</i>).</p> <p>You can do so anonymously (see <i>section 7</i>).</p>
2. Who can make a disclosure?	
<p>Eligible whistleblowers include individuals who are (or have been):</p> <ul style="list-style-type: none"> • Directors, officers and employees of MLPL; • Goods and service providers to MLPL (or employees of those providers); • Associates of MLPL (which includes the directors and company secretary of MLPL); and • A relative, dependant or spouse of any of the above. 	<p>Disclosures under the Victorian regime may be made by anyone.</p>

Federal (Commonwealth Whistleblower) regime	State (Victorian Public Interest Disclosure) regime
<p align="center">3. What can the disclosure be about?</p> <p>Disclosures may be made if you have reasonable grounds to suspect any of the following applies to MLPL (or its directors, officers or employees):</p> <ul style="list-style-type: none"> • Misconduct or an improper state of affairs or circumstances (including in relation to tax affairs). Misconduct includes fraud, negligence, default, breach of trust and breach of duty; • Conduct that constitutes an offence against, or in contravention of, any of the following: Corporations Act 2001 (Cth), Australian Securities and Investments Commission Act 2001 (Cth), Financial Accountability Regime Act 2023 (Cth), Banking Act 1959 (Cth), Financial Sector (Collection of Data) Act 2001 (Cth), Insurance Act 1973 (Cth), Life Insurance Act 1995 (Cth), National Consumer Credit Protection Act 2009 (Cth), Superannuation Industry (Supervision) Act 1993 (Cth); • Conduct that constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of twelve months or more; or • Conduct that represents a danger to the public or the financial system. <p>The conduct does not need to be contrary to a particular law to be protected.</p> <p>Disclosures that do not fit within the definitions above are not covered and protected under the Federal regime.</p> <p>Disclosures that relate to personal work-related grievances may not qualify for protection. Examples include:</p> <ul style="list-style-type: none"> • interpersonal conflict at work; • a decision about promotion; and • a decision to suspend or terminate employment, or other disciplinary action. <p>These matters do not, of themselves, qualify for protection. However, a personal work-related grievance may still qualify for protection to the extent it includes information about a disclosable matter (for example, the grievance also involves fraud or other misconduct or the personal work-related grievance has arisen because you are a whistleblower who has been victimised).</p> <p>A disclosure that ultimately turns out to be incorrect can still qualify for protection.</p>	
<p align="center">4. What are some examples of the types of this that can be disclosed?</p>	
<p>Examples of disclosure of conduct at MLPL that are likely to qualify for protection under this</p>	<p>Examples of disclosure of conduct at MLPL that are likely to qualify for protection under</p>

Federal (Commonwealth Whistleblower) regime	State (Victorian Public Interest Disclosure) regime
<p>regime include:</p> <ul style="list-style-type: none"> • Offering or accepting a bribe; • Fraud or misappropriation of funds; • Engaging in detrimental conduct against someone who has made a whistleblower disclosure; and • Illegal conduct such as theft, illicit drug use, violence or criminal damage. 	<p>this regime include:</p> <ul style="list-style-type: none"> • Offering or accepting a bribe; or • Deliberately using substandard materials to cut cost in an infrastructure project, creating a substantial risk to public health or safety.
5. Who can I make a disclosure to and how?	
<p><i>MLPL's designated disclosure recipients</i></p> <p>To enable MLPL to deal with disclosures as quickly and efficiently as possible, MLPL encourages disclosures to be made to:</p> <ul style="list-style-type: none"> • Nicholas Aird, General Counsel and Company Secretary: nicholas.aird@marinuslink.com.au; or • Prajit Parameswar, Chief Financial and Commercial Officer: prajit.parameswar@marinuslink.com.au; or • Sandra Gamble, Chair: sandra.gamble@marinuslink.com.au; or • If you do not feel comfortable making the disclosure to the above persons, you can make a disclosure using KPMG's FairCall, an independent whistleblower service established by MLPL (see section 3.2 (<i>Whistleblower Hotline</i>) of the policy for details). <p>A disclosure can be made in writing, in person or over the phone.</p> <p>A disclosure must be made directly to an eligible person or to FairCall to qualify for protection.</p> <p>Disclosures can be made at any time (including after hours) and may be made anonymously (see <i>section 7</i> below). MLPL encourages whistleblowers who feel comfortable doing so to identify themselves as doing so is likely to assist with the investigation and resolution of the matters disclosed.</p> <p><i>Other eligible disclosure recipients</i></p> <p>A disclosure under the Federal regime may also be made to:</p> <ul style="list-style-type: none"> • the Australian Securities and Investments Commission, the Australian Prudential Regulation Authority or other Federal authority that may be designated under the legislation. Each of these entities publishes information on how disclosures may be 	<p>MLPL is not permitted to receive public interest disclosures under the PID Act. A disclosure must be made directly to one of the entities listed below to qualify for protection.</p> <p>A disclosure under the State regime must be made to:</p> <ul style="list-style-type: none"> • The IBAC • The Victorian Ombudsman; or • Integrity Oversight Victoria.

Federal (Commonwealth Whistleblower) regime

State (Victorian Public Interest Disclosure) regime

made to them;

- any officer or senior manager of MLPL (including MLPL directors and Executive Leadership Team members);
- MLPL's independent whistleblower service (KPMG's FairCall, see section 3.2 (*Whistleblower Hotline*) of the policy for contact details); and
- MLPL's internal auditor or external auditor.

There are other eligible recipients under the Tax Act specifically in respect of tax-related disclosures.

The Federal regime provides for:

- disclosures to also be made to a member of Federal or State parliament or a journalist in certain circumstances, including if an eligible whistleblower believes there is substantial and imminent danger to the health or safety of one or more people or to the natural environment. You are encouraged to look at the legal criteria for making such a disclosure before taking this step; and
- disclosures to be made to a legal advisor for the purpose of getting legal advice in relation to whistleblower protection. MLPL's legal team is only able to advise MLPL and cannot provide you with legal advice but they can provide you with guidance on how to obtain legal advice.

6. What protections are available to me?

If you make a protected disclosure, the Federal regime will provide you with certain legal protections.

The Federal regime prohibits:

- any victimisation or detrimental action (for example, termination of employment, demotion or harassment) or the threat of such action, by a person against another person based on a belief that the person has, may have or proposes to or could make a protected disclosure; and
- any action (for example, via civil, criminal or administrative action) being taken against an eligible whistleblower for making a disclosure that qualifies for protection. This protection does not apply to any conduct of the discloser which is a part of the disclosed conduct (for example, if the discloser has engaged in misconduct).

The courts can make a wide range of orders in the event that any of the conduct described

If you make a protected disclosure, the State regime will provide you with certain legal protections.

The Victorian regime prohibits detrimental action from being taken against a person in reprisal for making or intending (or who is believed to have made) a public interest disclosure.

Detrimental action includes:

- harassment or intimidation;
- injury or damage;
- discrimination or other adverse treatment; or
- dismissal or other adverse consequences to employment.

The courts can make a wide variety of preventative and compensatory orders if it is

Federal (Commonwealth Whistleblower) regime	State (Victorian Public Interest Disclosure) regime
<p>above is found to have occurred, including orders for compensation, injunction (i.e. an order to stop certain behaviour from continuing), reinstatement of your employment (if you were terminated) and an apology.</p>	<p>decided that detrimental action has been taken against you. This includes injunctions (i.e. an order to stop the detrimental action) or monetary compensation.</p>
7. Will my identity be protected?	
<p>The Federal regime requires that the identity and identifying information of the eligible whistleblower is protected, subject to limited exceptions. These exceptions include if the eligible whistleblower agrees to have their identity revealed (whether generally or only to certain people such as the Board of Directors).</p> <p>MLPL takes these protections seriously.</p> <p>When investigating a disclosure, MLPL will ensure these legal protections relating to the eligible Whistleblower's identity are available to any eligible whistleblower. The protections apply not only to internal disclosures, but to all methods of disclosure referred to in <i>section 5</i> above.</p>	<p>The Victoria regime requires that information provided in a disclosure must kept confidential (including the identity of the discloser and information likely to lead to the identification of a discloser), with limited exceptions.</p> <p>Where a person's identity does need to be shared, the discloser will be advised, and steps will be taken to minimise potential impacts.</p>
8. How will a disclosure be investigated?	
<p>If the Federal regime applies to the disclosure, then MLPL will (as appropriate in the circumstances and confidentiality requirements permitting):</p> <ul style="list-style-type: none"> • consider reporting requirements (for example, to external authorities if there is any immediate risk to persons or the environment); • take steps to ensure that the discloser's welfare (including their psychological welfare) is considered and monitored; • consider the scope of investigation required and creating a plan of investigation; • advise the MLPL Board; • conduct the investigation (as appropriate, and with due consideration to confidentiality, impartiality and procedural fairness); and • report outcomes to the discloser and the MLPL Board, including a copy of the investigation report into the matter (where a formal investigation is conducted) and the actions to be taken (if any). <p>The extent of each action and timeframes in which they will be conducted depend on the nature and scope of the disclosure made. However, formal investigations will usually be conducted within 90 days of the disclosure being made.</p>	<p>Information on how a disclosure will be investigated can be found at the websites of each of the three regulatory bodies authorised to received disclosures, as follows:</p> <ul style="list-style-type: none"> • The IBAC; • The Victorian Ombudsman; or • Integrity Oversight Victoria.

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9. What should I do if I believe that I have suffered detriment because of my disclosure?	
<p>You should immediately advise:</p> <ul style="list-style-type: none">• Nicholas Aird, General Counsel and Company Secretary; or• MLPL’s independent whistleblower service (see section 3.2 (<i>Whistleblower Hotline</i>) of the policy for contact details), <p>if you believe you are being or may be subject to detrimental conduct.</p> <p>MLPL takes these matters seriously and will take appropriate steps to address your concerns.</p>	<p>You should immediately report the matter to one of the entities listed in <i>section 5</i> above.</p>