

Whistleblower Policy
(External Document)

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1 OVERVIEW

1.1 We encourage an open and honest culture in all our dealings between staff, managers and the Executive, our clients, our service providers and all people with whom we come into contact. The highest standards of behaviour are essential in order to ensure continuing client and market confidence in us. It is critical therefore that we have a process whereby any activities or actions that offend our shared values, The Gallagher Way or our Standards of Business Conduct can be properly notified and acted upon.

1.2 The protections available under this policy are intended to provide you with the confidence to speak up. You have a responsibility to report possible wrongdoing and ask questions when you need help or guidance. Doing so helps us minimise or avoid the consequences of any legal or ethical wrongdoing before it becomes an issue. Timely reporting can also prevent a situation from escalating. Finally, it helps us to reveal issues and take steps to prevent future wrongdoing.

1.3 This policy is for Elantis Premium Funding Limited who are part of an Australian group of companies owned by Arthur J Gallagher & Co (Gallagher Group). The Gallagher Group is one of the world's leading providers of insurance broking, risk management and consulting services. The parent company, Arthur J. Gallagher & Co, was founded in the United States in 1927 and is listed on the New York Stock Exchange.

2 PURPOSE

2.1 The purpose of this Whistleblower policy (**'this policy'**) is to:

(a) formalise our culture of transparency and accountability;

(b) support our risk management and governance framework by deterring wrongdoing;

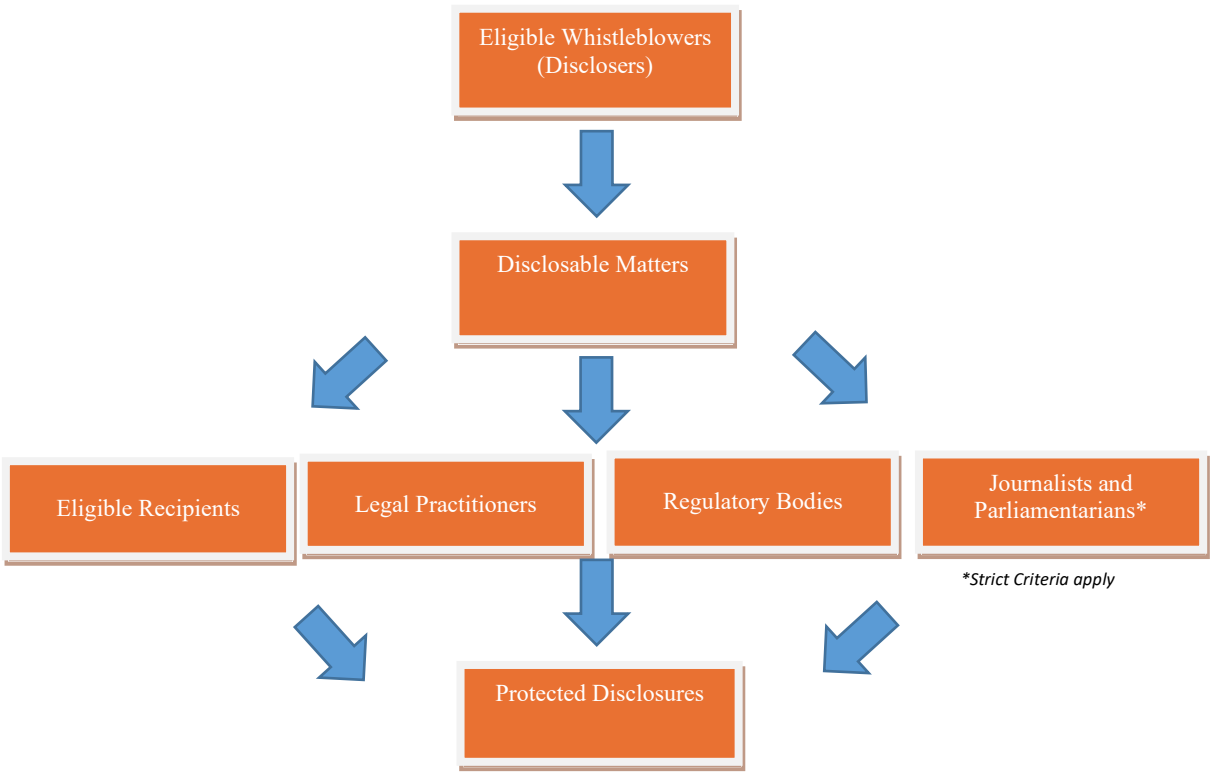
(c) encourage disclosures of wrongdoing;

(d) provide transparency around our framework for receiving, handling and investigating disclosures;

(e) ensure disclosures are dealt with appropriately and on a timely basis;

(f) ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported.

3 WHISTLEBLOWER PROTECTIONS AND TERMINOLOGY



4 WHO THIS POLICY APPLIES TO

The following individuals ('disclosers') can make a disclosure that qualifies for protection under the Corporations Act 2001:

(a) our current and former directors and officers;

(b) our current and former employees, whether permanent, part-time, fixed-term or temporary, interns, secondees and managers;

(c) our current and former contractors, consultants, service providers and business partners or our other suppliers of services or goods (whether paid or unpaid), including their employees;

(d) an associate of ours;

(e) relatives, dependants or spouses of any of the individuals identified at paragraphs (a) to (d).

5 MATTERS THAT THIS POLICY APPLIES TO – PROTECTED DISCLOSURES

5.1 Disclosable matters are those that qualify for protection under the Corporations Act ('disclosable matters'). Disclosable matters involve information that the discloser has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to us or another company in the Gallagher Group.

(a) 'Misconduct' includes fraud, negligence, default breach of trust and breach of duty.

(b) The phrase 'improper state of affairs or circumstances' is not defined by the Corporations Act and is intentionally broad.

(c) 'Reasonable grounds to suspect' means that the reasons for the discloser's suspicions are reasonable from an objective standpoint. The discloser's personal opinion or their motive for making the disclosure does not prevent them from qualifying for protection. In practice a mere allegation with no supporting information is not likely to be considered as having 'reasonable grounds to suspect'. However, a discloser does not need to prove their allegations

5.2 Disclosable matters also involve information about us and or other companies in the Gallagher Group if the discloser has reasonable grounds to suspect that the information indicates that we or another Gallagher company (including our or their employees or officers) have engaged in conduct that:

(a) constitutes an offence against, or a contravention of, a provision of any of the following:

(i) the Corporations Act 2001;

(ii) the Australian Securities and Investments Commission Act 2001;

(iii) the Banking Act 1959;

(iv) the Financial Sector (Collection of Data) Act 2001;

(v) the Insurance Act 1973;

(vi) the Life Insurance Act 1995;

(vii the National Consumer Credit Protection Act 2009;

(viii) the Superannuation Industry (Supervision) Act 1993;

(ix) an instrument made under an Act referred to in paragraphs (a)(i) to (a)(viii) above.

(b) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;

(c) represents a danger to the public or the financial system; or

(d) is prescribed by regulation.

5.3 The following are examples of disclosable matters:

(a) fraud, money laundering or misappropriation of funds;

(b) offering or accepting a bribe;

(c) financial irregularities;

(d) failure to comply with, or breach of, legal or regulatory requirements;

(e) 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.

5.4 Disclosable matters include conduct that may not involve a contravention of a particular law.

5.5 Information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a disclosable matter, even if it does not involve a breach of a particular law.

5.6 A discloser can still qualify for protection even if their disclosure turns out to be incorrect. However, deliberate false reporting will not be protected under this policy.

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

(a) it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);

(b) the entity has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;

(c) the discloser suffers from or is threatened with detriment for making a disclosure;

(d) the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

6 OTHER MATTERS THIS POLICY APPLIES TO

6.1 This policy also applies to reports of violations of the Global Standards of Business Conduct, company policy and other laws, whether unethical, unlawful or illegal, as they may carry serious consequences for us and other companies in the Gallagher Group as well as the individuals involved. Furthermore, such behaviour places the Gallagher Group at risk of reputational damage, fines and possible civil and/or criminal liability.

6.2 We encourage and values transparency and a commitment to the shared values, The Gallagher Way and the Global Standards of Business Conduct and applies the principles of this policy to reports of unethical, unlawful or illegal conduct. However, reports of these matters do not qualify for protection under the Corporations Act unless they are also protected disclosures as outlined in paragraph 5 of this policy.

7 MATTERS THIS POLICY DOES NOT APPLY TO

7.1 Disclosures that are not about disclosable matters do not qualify for protection under the Corporations Act.

7.2 Disclosures made to individuals or entities not listed in this Policy as an internal or external Eligible Recipient, will not qualify for protection under the Corporations Act.

7.3 Disclosures that relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the discloser, do not qualify for protection under the Corporations Act. Examples of personal work-related grievances include:

(a) an interpersonal conflict between the discloser and another employee;

(b) a decision that does not involve a breach of workplace laws;

(c) a decision about the engagement, transfer or promotion of the discloser;

(d) a decision about the terms and conditions of engagement of the discloser;

(e) a decision to suspend or terminate the engagement of the discloser, or to otherwise discipline the discloser.

7.4 We have procedures for addressing personal work-related grievances. The Creating an Inclusive Workplace Policy sets out the actions that you may take to resolve workplace concerns and grievances and how we will support you in that process. That Policy is available on the Intranet and a copy can be provided by HR upon request.

7.5 Disclosures concerning personal work-related grievances may be protected under other legislation such as the Fair Work Act 2009.

8 WHO CAN RECEIVE A DISCLOSURE

8.1 Our approach to receiving protected disclosures is intended to build confidence and trust in this policy, our processes and our procedures. To enable us to identify and address wrongdoing as early as possible, we encourage you to make a disclosure to us or our auditor in the first instance. Disclosures can be made anonymously and still be protected under the Corporations Act.

8.2 ***Independent reporting service:*** Gallagher provides an independent and confidential whistleblower telephone and online reporting service which is available 24 hours and 7 days a week, for the purposes of protected disclosures:

The Gallagher Ethics and Compliance Hotline:
Australia: 1-800-138-156

The Gallagher Ethics and Compliance Web Reporting Tool:
https://ajg.speakfullynow.com

8.3 ***Elantis/Gallagher personnel:*** For a disclosure to qualify for protection under the Corporations Act, it must be made directly, verbally or in writing, to any internal or external Eligible Recipient listed in this section:

Peter Searson, Elantis and Gallagher Chairman
(E) Peter.Searson@ajg.com.au (T) 0439 381 090

Ben Farmer, Head of Legal and Company Secretary
(E) ben.farmer@ajg.com.au (T) 02 9424 1705

Jordan Rosenfeld, Gallagher Global Chief Compliance Officer
(E) Jordan_rosenfeld@ajg.com (T) +1 630 285-3412

8.4 ***Internal and external auditors:*** Protected disclosures can be made to:

Our internal auditor, including a member of an audit team conducting an audit
Main contact: Michael A. Goggio
Corporate Vice President & Global Chief Audit Executive
(E) Mike_Goggio@ajg.com (T) +1 630 285 4085

2850 Golf Road, Rolling Meadows, IL 60008Our external auditor, EY, including a member of an audit team conducting an audit
Main contact: Tim Dachs, Partner, Assurance
(E) timothy.dachs@au.ey.com (T) 08 9429 2111

EY Building, 11 Mounts Bay Road, Perth 6000

8.5 ***External disclosures:*** You can make a disclosure directly to regulatory bodies or other external parties and qualify for protection under the Corporations Act without making a prior disclosure to us. Such disclosures may be made to:

Legal Practitioners: Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act are protected

***Regulatory Bodies*:** Disclosures may be made to ASIC or APRA. Other Commonwealth bodies may be prescribed by regulation (but are not as at the date of this policy).

- ASIC provides an Information Sheet 239 on how it handles whistleblower reports:https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports/

8.6 ***Public Interest and Emergency Disclosures:*** Disclosures can be made to a journalist or parliamentarian under certain circumstances and qualify for protection. It is essential that a discloser understand the criteria for making a public interest or emergency disclosure to a journalist or a parliamentarian. A discloser should contact an independent legal adviser before making a public interest disclosure or an emergency disclosure.

Public interest disclosures A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:

(a) at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;

(b) the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;

(c) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and

(d) before making the public interest disclosure, the discloser has given written notice to the body to which the previous disclosure was made) that: (i) includes sufficient information to identify the previous disclosure; and (ii) states that the discloser intends to make a public interest disclosure.

Emergency disclosures An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:

(a) the discloser has previously made a disclosure of the information to ASIC or APRA;

(b) the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;

(c) before making the emergency disclosure, the discloser has given written notice to the body to which the previous disclosure was made) that: (i) includes sufficient information to identify the previous disclosure; and (ii) states that the discloser intends to make an emergency disclosure; and

(d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

8.7 ***Further Information:*** If, prior to making a disclosure, you require further information about making a disclosure or how this policy works, you can contact:

Ben Farmer, Head of Legal and Company Secretary
(E) ben.farmer@ajg.com.au (T) 02 9424 1705

9 ANONYMOUS DISCLOSURE

9.1 Disclosures can be made anonymously and still be protected under the Corporations Act. A discloser can choose to remain anonymous:

(a) while making a disclosure,

(b) over the course of the investigation; and

(c) after the investigation is finalised.

9.2 The Gallagher Ethics and Compliance Hotline and Web Reporting Tool enable disclosers to maintain their anonymity.

9.3 Where a disclosure comes from an email address from which the discloser's identity cannot be determined, and the discloser does not identify themselves in the email, it will be treated as an anonymous disclosure.

9.4 A discloser may choose to adopt a pseudonym for the purpose of their disclosure, regardless of the method by which the disclosure is made.

9.5 We suggest that a discloser who wishes to remain anonymous maintains ongoing two-way communication with us, so we can ask follow-up questions or provide feedback. However, a discloser can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

10 LEGAL PROTECTION FOR DISCLOSERS

10.1 The following protections are available under the Corporations Act to disclosers making a protected disclosure. The protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Corporations Act:

(a) Identity protection and confidentiality:

(b) Protection from detrimental acts or omissions;

(c) Compensation and other remedies; and

(d) Civil, criminal and administrative liability protection.

10.2 ***Identity Protection and Confidentiality***

(a) We are legally obligated to protect the confidentiality of a discloser's identity. Unless an exception applies, it is illegal for a person to disclose the identity of a discloser or information that is likely to lead to the identification of the discloser, which has been obtained directly or indirectly because the discloser made a disclosure that qualifies for protection.

(b) The exceptions that apply are disclosure of the discloser's identity:

(i) to ASIC, APRA or a member of the Australian Federal Police;

(ii) to a legal practitioner, for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act;

(iii) to a person or body prescribed by regulations; or

(iv) with the consent of the discloser.

(c) We can disclose the information contained in a disclosure with or without the discloser's consent if:

(i) the information does not include the discloser's identity

(ii) we have taken all reasonable steps to reduce the risk that the discloser will be identified from the information; and

(iii) it is reasonably necessary for investigating the issues raised in the disclosure.

10.3 ***How we protect your identity and confidentiality***

(a) Where requested, the person receiving the disclosure will discuss with the discloser our measures for ensuring confidentiality of their identity. Where possible, the discloser should assist the person receiving the disclosure to identify certain aspects of their disclosure that could inadvertently identify them.

(b) A discloser should be aware that their identity may be able to be guessed if they have previously mentioned to others that they are considering making a disclosure, they are one of a very small number of people with access to the information, or they have been told the information privately and in confidence.

(c) We will take appropriate steps to ensure that:

(i) all paper and electronic documents and other materials relating to disclosures are stored securely;

(ii) only suitably qualified and experienced staff are involved in managing and investigating the disclosure;

(iii) access to information relating to a disclosure is limited to those directly involved in managing and investigating the disclosure;

(iv) each person who is involved in handling and investigating a disclosure is aware of the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence;

(v) with the discloser's consent, only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity or information that is likely to lead to the identification of the discloser;

(vi) the discloser is referred to in a gender-neutral context.

10.4 ***Protection from detrimental acts or omissions***

(a) A person cannot engage in conduct that causes detriment to a discloser (or another person), in relation to a disclosure, if:

(i) the person believes or suspects that the discloser (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; and

(ii) the belief or suspicion is the reason, or part of the reason, for the conduct.

(b) In addition, a person cannot make a threat to cause detriment to a discloser (or another person) in relation to a disclosure. A threat may be express or implied, or conditional or unconditional. A discloser (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

(c) Examples of detrimental conduct that are prohibited under the law, include:

(i) dismissal of an employee;

(ii) alteration of an employee's position or duties to his or her disadvantage;

(iii) discrimination between an employee and other employees of the same employer;

(iv) harassment or intimidation of a person;

(v) damage to a person's property, reputation or any other damage to a person.

(d) The following are examples of actions that are not detrimental conduct:

(i) 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);

(ii) managing a discloser's unsatisfactory work performance, if the action is in line with the entity's performance management framework.

*10.5 **Risk assessment for detrimental acts or omissions***

(a) As soon as possible after receiving the disclosure, the recipient of the disclosure will undertake a confidential assessment of the risk of detriment against a discloser and other persons (for example, other staff who might be suspected to have made a disclosure) including identifying and assessing:

(i) whether anyone may have a motive to cause detriment;

(ii) the risk of the discloser's (and other persons) identity becoming known;

(iii) the risk of the discloser becoming readily identified or becoming apparent during an investigation;

(iv) who the discloser fears might cause detriment to them;

(v) whether there are any existing conflicts or problems in the workplace; and

(vi) whether there have already been threats to cause detriment.

(b) The recipient of the disclosure will:

(i) analyse and evaluate the likelihood of each risk set out at paragraph (a) and evaluate the severity of the likely consequences

(ii) develop and implement strategies to prevent or contain the risks;

(iii) record the assessment and risk control plan; and

(iv) where appropriate, and subject to protection of the discloser's (and other persons) identity and confidentiality, escalate the risk assessment and risk

control plan for review by the relevant Compliance Officer or Manager or Compliance Committee.

(c) The recipient of the disclosure will take actions to protect the discloser and other persons from any risk of detriment, including:

(i) allow the discloser to perform their duties from another location;

(ii) reassign the discloser to another role at the same level;

(iii) make other appropriate modifications to the discloser's workplace or the way they perform their work duties;

(iv) reassign or relocate other staff involved in the disclosure.

(d) The recipient of the disclosure will monitor and reassess the risk of detriment where required: as the investigation progresses and after the investigation is finalised and report, as appropriate, to the relevant independent Compliance Officer or Manager or Compliance Committee.

(e) The Gallagher Group provides counselling support services through its confidential Employee Assistance Program to assist a discloser minimise and manage stress or other challenges resulting from the disclosure or its investigation.

(f) By providing appropriate training, we ensure that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts and ensure fairness when managing the performance of, or taking other management action relating to, a disclosure.

(d) If they have suffered detriment, a discloser may lodge a complaint with any of the other eligible recipients identified at paragraph 8.3 that are not involved in investigating and managing the original disclosure. That eligible recipient will undertake an independent and confidential investigation of the complaint and the findings will be reported to the Gallagher Australia and New Zealand Audit and Risk Committee.

(e) If detriment has occurred, we will address the detrimental conduct, for example, by taking disciplinary action, allowing the discloser to take leave, introducing the discloser to new career opportunities in the Gallagher Group, or offering compensation or other remedies.

(f) If they believe that they have suffered detriment, a discloser may seek independent legal advice or contact regulatory bodies such as ASIC.

10.6 ***Compensation and other remedies***

(a) A discloser (or any other employee or person) can seek compensation and other remedies through the courts if:

(i) they suffer loss, damage or injury because of a disclosure; and

(ii) we failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

(b) We encourage disclosers to seek independent legal advice regarding their potential entitlement to compensation and other remedies.

10.7 ***Civil, criminal and administrative liability protection***

(a) A discloser is protected from any of the following in relation to their disclosure:

(i) civil liability for example any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation;

(ii) criminal liability, for example 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

(iii) administrative liability, for example disciplinary action for making the disclosure.

(b) These protections do not grant immunity for any misconduct a discloser has engaged in that is revealed in their disclosure.

11 HANDLING AND INVESTIGATING A DISCLOSURE

11.1 When a disclosure is anticipated, our eligible recipients will determine whether the location and time are appropriate for:

(a) the discloser to make their disclosure comfortably; and

(b) ensuring that the discloser is protected.

11.2 In the event that the location and or time are not appropriate, the eligible recipient will propose alternative arrangements to the proposed discloser.

11.3 Following receipt of a disclosure, we will assess the disclosure to determine whether:

(a) it qualifies for protection under the Corporations Act; and

(b) an investigation is required.

11.4 We will focus on the substance of the disclosure, not the possible motive for the disclosure.

11.5 Where it is unclear whether the disclosure qualifies for protection, we will treat the disclosure as if it were a protected disclosure under the Corporations Act unless it is determined otherwise.

11.6 If we determine that we will need to investigate the disclosure, we will determine:

(a) the nature and scope of the investigation;

(b) whether the investigation should be conducted as a broad review on the subject matter or the work area disclosed;

(c) the person(s) within and or outside our company that should lead the investigation;

(d) the nature of any technical, financial or legal advice that may be required to support the investigation; and

(e) the timeframe for the investigation, which may vary depending upon the nature of the disclosure.

11.7 Our investigation will be conducted:

(a) in an objective, fair and independent manner;

(b) confidentially;

(c) independently of the discloser and the individuals the subject of the disclosure, and independently of the division involved.

11.8 Where practicable and appropriate, we will provide updates to the discloser regarding the progress and outcome of the investigation, subject to confidentiality, privacy and legal constraints.

12 ENSURING FAIR TREATMENT OF INDIVIDUALS MENTIONED IN A DISCLOSURE

12.1 We will ensure the fair treatment of the individuals who are mentioned in a protected disclosure, including those who are the subject of a disclosure by:

(a) handling disclosures confidentially, when it is practical and appropriate in the circumstances;

(b) advising the individual who is the subject of a disclosure about the subject matter of the disclosure, as and when required by principles of natural justice and procedural fairness and prior to any actions being taken—for example, if the disclosure will be the subject of an investigation or prior to making any adverse finding against them (as appropriate and to ensure that the effectiveness of the investigation is not compromised);

(c) advising the employee who is the subject of a disclosure as to the availability of a confidential Employee Assistance Program;

(d) undertaking an investigation when appropriate and in accordance with this policy.

13 REVIEWING AND UPDATING THIS POLICY

This policy will be reviewed at least every 2 years and whenever legislative, regulatory, governance or operational changes require.