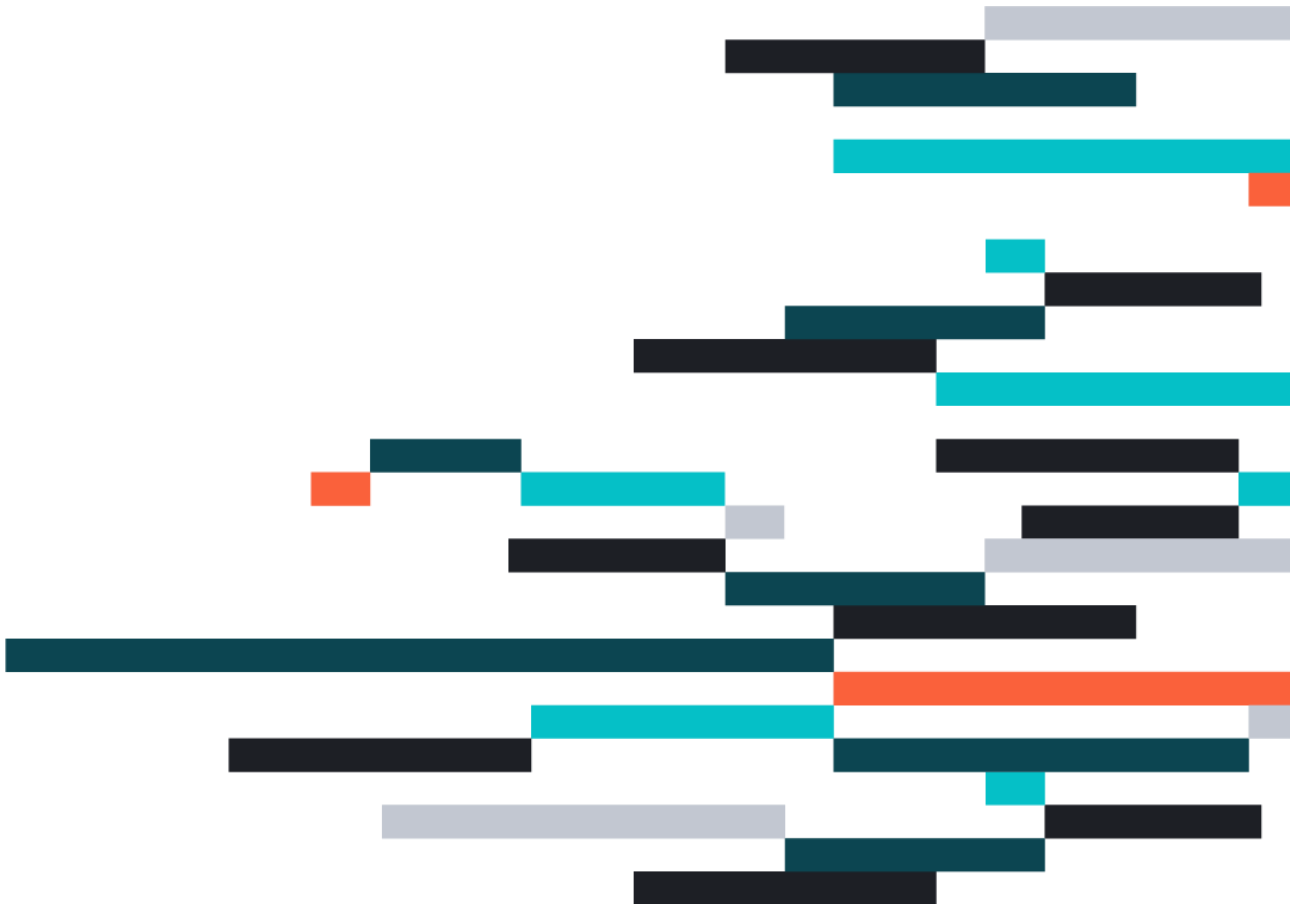




Whistleblower Policy

February 2026





1. Introduction

Diversa Trustees Pty Ltd (Diversa) and CCSL Ltd (CCSL) (collectively referred to as Diversa or the Trustee) operate within the highly regulated financial services sector. Diversa and CCSL each hold an Australian Financial Services (AFS) License (AFSL) and are Registrable Superannuation Entity (RSE) Licensees.

The purpose of the Policy is to encourage disclosures of wrongdoing and provide those who make disclosures a safe, secure and confidential channel that protects and supports.

This policy outlines the systems, structures, and processes in place to encourage the reporting of matters that could potentially cause financial, non-financial, or reputational damage to Diversa. We are dedicated to ensuring that all disclosures are handled and investigated with transparency.

2. Application

This Policy applies to all current and former:

- Directors and senior executives.
- Employees (including permanent, part-time, fixed-term, or temporary).
- Contractors, consultants, and service providers (including their employees).
- Relatives, dependents, or spouses of any of the above.

This policy does not cover members of Diversa funds, unless they are defined as an 'whistle-blower'. For complaints in relation to the Diversa funds, members should follow the established complaints processes.

2.1 Review

This policy is reviewed annually to ensure it remains appropriate and to ensure to ensure ongoing compliance with relevant legislation.

2.2 Consequences of breaching this Policy

Any breach of the Code of Conduct should be considered reportable under the Incident Management Policy. Alternatively, breaches of the Code of Conduct may be reported in accordance with the Whistleblowing Policy, where the reporter would like to enact the protections provided under the Policy.

3. Who is a Whistle-blower?

A 'whistle-blower' in general terms is defined as a person, being a current or former officer, manager, employee, contractor or associate of Diversa, who, whether anonymously or not, makes, attempts to make or wishes to make a report of misconduct or dishonest or illegal activity that has occurred within an organisation.

4. What matters are Covered?

There are only certain matters that can be reported under the Whistleblowing Policy. Disclosures must be made with 'reasonable grounds,' meaning the suspicion has some supporting information, although proof is not required. Disclosable matters include:

- Concerns of misconduct or improper affairs
- Offences or contraventions of the Corporations Act, the Australian Securities and Investments Commission Act 2001 (ASIC Act), SIS Act, Financial Sector (Collection of Data) Act 2001
- Offences against any other Commonwealth law punishable by imprisonment for 12 months or more
- Danger to the public or the financial system
- Financial irregularities, such as potential fraud or corruption
- Failure to comply with legal or regulatory requirements
- Detrimental conduct against a person who has made a disclosure
- Breaches of the trust deed and rules applicable to Diversa
- Breaches of Commonwealth, State, or Territory legislation or regulations
- Conduct that may cause material financial or non-financial loss to Diversa.

Note: Personal work-related grievances (such as interpersonal conflicts or promotion decisions) generally do not qualify for protection under this Policy and should be handled through internal HR processes.

5. How to Make a Disclosure

Diversa provides several channels for reporting. While internal reporting is encouraged to allow us to address issues promptly, you may choose the channel you are most comfortable with.



5.1 Internal Channels

- Management: Your direct manager, where appropriate.
- Whistleblower Protection Officer (WPO): Responsible for safeguarding disclosers.
- Whistleblowing Investigation Officer (WIO): Responsible for investigating the substance of reports.

In all circumstances, Diversa is committed to identifying wrongdoing as early as possible and ensuring the whistleblowing program has the confidence of its staff. Therefore the use of internal channels will always be preferable in the first instance to allow Diversa to appropriately address the issue. This does not preclude an eligible whistle-blower from making a disclosure to the external channels noted above.

1.1.1 Whistle-blower Protection Officer

The whistle-blower has the option of being supported by the Whistle-blower Protection Officer (WPO), where the whistle-blower consents to the WPO knowing their identity. The WPO may be an officer, manager, employee or contractor, but would generally be the individual who holds the senior most Human Resources role. The WPO role is currently delegated to Perform HR, the outsourced provider of Diversa's HR function.

The WPO has the responsibility for protecting or safeguarding disclosers and ensuring the integrity of the reporting mechanism by reference to this Policy and relevant law. The person appointed as the WPO should be:

- Trustworthy
- Be able to relate to people and to reassure them
- Diplomatic and tactful and
- Able to remain objective.

The WPO will have direct and unrestricted access to any independent financial, legal and operational assistance reasonably required by this role.

1.1.2 Whistleblowing Investigation Officer

The Whistleblowing Investigation Officer (WIO) will also be an officer, manager, employee or contractor of Diversa. The WIO is a Senior Risk and Compliance Manager within the Risk & Compliance (R&C) team.

The WIO's role is to investigate (or appoint an internal or external resource to investigate) the substance of a report from a whistle-blower to discover evidence that supports or refutes the



matters raised in the report. The person appointed as or by the WIO should have the following qualities:

- Sound judgment
- Investigation skills
- Integrity
- Communication skills
- Diplomacy and
- Objectivity.

In some cases, the WIO may also engage the services of a qualified investigative service to plan and complete the investigation on their behalf.

5.2 External Independent Hotline

Diversa has engaged the services of **YourCall**, an external whistle-blower service, to provide an anonymous and independent employee hotline service and web portal. Disclosers may choose to use this service for any reason, including where they are not comfortable discussing an issue with their manager, the WPO or WIO. The discloser can choose to remain anonymous over the course of the investigation and after the investigation is finalised. The discloser can refuse to answer questions that they feel could reveal their identity at any time, even during follow up questions.

Where required, this service can also be appointed to undertake an investigation to ensure independence. Diversa's WPO, WIO and CEO will be notified of all lodgements, but the identity of the discloser will remain confidential unless otherwise advised by the discloser.

5.3 Other Eligible Recipients

You may also make a disclosure to:

- An officer, auditor, or actuary of Diversa.
- A registered tax agent or BAS agent who provides tax agent services or BAS services to Diversa.
- An individual who is a superannuation trustee.
- A director of registered entity that is the trustee or the superannuation entity.
- Regulators such as ASIC or APRA.
- A legal practitioner for the purpose of obtaining legal advice regarding whistleblower protection.

6. Protections for Whistleblowers

Diversa is committed to ensuring that individuals who make a report in good faith are protected from any form of victimisation.

- **Identity Protection (Confidentiality):** It is illegal for a person to disclose your identity or information likely to lead to your identification without your consent, unless allowed by law (e.g., disclosure to ASIC or a legal practitioner).
- **Protection from Detriment:** Diversa will not tolerate dismissal, demotion, harassment, or discrimination against any person because they made a disclosure.
- **Liability Protection:** You are protected from civil, criminal, and administrative liability in relation to your disclosure.

Any person considering reporting conduct must ensure that their information is factually accurate, complete, and unbiased. False, trivial, malicious, or provoking reports are not protected under this policy.

7. Investigation Process

All reports will be treated seriously and investigated appropriately by the WIO or an independent party.

- **Objectivity:** Investigations will be conducted in a fair and objective manner.
- **Feedback:** If you are an employee, you will generally receive feedback within 6 weeks of making a report and be kept informed of the progress on a regular basis.
- **Outcome:** You will be advised of the outcome of the investigation.

8. Privacy and Security of Personal Information

All information received or kept internally in the course of a receiving, managing or responding to a whistleblowing disclosure is protected in accordance with Diversa's IT Security Strategy and in accordance with the Privacy Policy.

The use of a third-party as a whistleblowing channel also means that Diversa's standards of Data Management, IT Security and Privacy must be maintained by the service provider. These standards are assessed while conducting due diligence on a new provider or renewing the contract with an existing provider. Refer to the Outsourcing Policy for further guidance.



The provider's ongoing ability to comply with Diversa's standards of Privacy, Data Management and IT Security will be assessed on at least an annual basis or as required under the relevant policies.

9. Training and Awareness

The importance of disclosing reportable conduct will be explained as part of the induction and ongoing training at Diversa. This content is contained within the Code of Conduct training which is part of the Mandatory Compliance Training.

Diversa is committed to upfront and ongoing education and training to its officers and employees regarding the Whistleblowing Policy.

Contact Details

To make a disclosure or for further information regarding this Policy, please contact:

- **Email:** complaints@diversa.com.au
- **YourCall:** www.yourcall.com.au/diversa
- **Postal Address:** GPO Box 3001, Melbourne Vic 3001

