

Whistleblower Policy

Nous Group

1 Whistleblowing

1.1 Overview and purpose

Nous Group (**Nous**) takes pride in acting with honesty, integrity and transparency. We are committed to approaching our work ethically and objectively, and ensuring we deliver on our purpose of achieving positive influence. Ethical ways of working are deeply embedded in our workplace culture.

Whistleblowing is the act of speaking up to report suspected or actual Misconduct. It is important to promote accountability, integrity, and transparency by ensuring any Misconduct is identified and promptly addressed.

Nous is committed to maintaining a safe and inclusive environment where individuals can report Misconduct without fear of Detrimental Conduct. Nous will not tolerate any victimisation or retaliation towards any Whistleblower.

The purpose of this policy is to:

- provide an understanding of what can be reported under this policy.
- encourage reports of Misconduct to be raised as soon as possible.
- provide guidance and information on the whistleblower process, including;
 - how to report any Misconduct;
 - the confidentiality and other protections that will apply; and
 - how any reported concerns will be investigated.
- comply with legislative requirements to ensure protection is afforded to Eligible Whistleblowers who make a Protected Disclosure under relevant Whistleblower Laws.

This policy outlines how Nous will receive and respond to a Whistleblower's report of Misconduct. Nous' internal Grievance Policy and Performance Policy separately detail how Nous manages personal workplace grievances and/or disciplinary action relating to workplace-related concerns for our employees.

1.2 Definitions

The definitions for the capitalised term(s) in this policy are described below.

Authorised Persons means the individuals at Nous who are authorised to receive and review any Whistleblower disclosures, being Nous Group's General Counsel and legal team, Chief People Officer and Company Secretary, who are contactable via governance@nousgroup.com.

Detrimental Conduct includes actual or threatened dismissal, injury, demotion, discrimination, harassment, intimidation, disciplinary action, bias, threats or other unfavourable treatment because an Eligible Whistleblower made, proposes to make, or could make a report under this policy.

Eligible Whistleblower includes any current or former:

- Nous employees;
- Nous contractors, subcontractors, associates, vendors or suppliers; and
- spouses, dependents or relatives of an individual identified above.

Misconduct means any actual or suspected misconduct at Nous (or connected to Nous), including, but not limited to:

- fraud (including, but not limited to, inappropriate use of credit cards and tax fraud);
- deliberately falsifying records;
- gross negligence;

- corrupt conduct;
- breach of trust;
- breach of Nous' Professional and Ethical Standards or Nous' Supplier Code of Conduct;
- breach of Code of Conduct requirements or other ethical expectations of any Nous client;
- modern slavery in Nous' supply chain; and
- legal or regulatory non-compliance, including any type of unlawful or immoral activities.

Nous Group means Nous Group International Pty Ltd (ABN 77 602 163 879) and its related bodies corporate, including:

- Nous Group Pty Ltd (ABN 66 086 210 344)
- Nous Group (UK) Ltd (Company Number 09271803)
- Nous Group Holdings (Canada) Ltd. (CRA Business Number 767369333)
- Nous Data Insights Group Pty Ltd. ABN 15 613 111 443
- Nous Data Insights Pty Ltd (ABN 23 106 955 962)
- Nous Data Insights (ANZ) Pty Ltd (ABN 44 139 204 943)
- Nous Data Insights (UK) Ltd (Company Number 09526740)
- Nous Data Insights (Canada) Ltd (CRA Business Number 760487322)
- Health Policy Analysis Pty Ltd (ABN 54 105 830 920)

Protected Disclosure refers to an eligible disclosure of Misconduct under whistleblower laws in:

- Australia: *Corporations Act 2001* (Cth), *Taxation Administration Act 1953* (Cth);
- UK: *Employment Rights Act 1996* (amended by the Public Interest Disclosure Act 1998); or
- Canada: various Canadian federal and provincial laws, including the *Criminal Code of Canada*,

(collectively, the "**Whistleblower Laws**").

Whistleblower means an Eligible Whistleblower who reports on Nous (or an individual at Nous) where they have observed, or have reasonable grounds to suspect, Nous (or an individual at Nous) has engaged in, or is engaging in, any Misconduct.

2 How to report Misconduct

This section sets out the ways in which a Whistleblower can report any Misconduct:

1. To Nous Authorised Persons

A Whistleblower can report any Misconduct to the Authorised Persons by emailing governance@nousgroup.com.

Whistleblowers may also contact Nous' General Counsel and legal team directly (by emailing legal@nousgroup.com), if preferable.

If the Misconduct is in relation to an Authorised Person, we recommend Whistleblowers use the Whistleblower Hotline below.

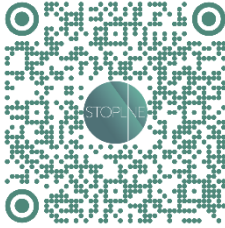
2. To an independent Whistleblower Hotline

Whistleblowers can report any Misconduct to Nous' independently managed whistleblower hotline (**Whistleblower Hotline**). The Whistleblower Hotline is operated by Stopline, a third-party provider engaged by Nous, to ensure confidentiality, impartiality, and (where requested) anonymity for all

Whistleblowers (**Independent Hotline Provider**).

The Whistleblower Hotline can be accessed by:

- Telephone – 1300 30 45 50 (Australia) or +61 3 9882 4550 (All countries, including UK and Canada)
- Website – submitting an online report at [Stopline Case Manager](#)
- Email – makeareport@stopline.com.au
- Post – Nous Group c/o Stopline Pty Ltd, PO Box 403, Diamond Creek, VIC 3089 Australia
- QR Code:



3. To a regulatory body

While we encourage Whistleblowers to report any Misconduct directly with the Authorised Persons or Whistleblower Hotline in the first instance, Protected Disclosures may also be made to the following regulatory bodies:

- **Australia:** ASIC [Whistleblower rights and protections | ASIC](#); either by [Make a report of misconduct to ASIC](#) or in [writing to ASIC](#).
- **UK:** [Whistleblowing for employees: What is a whistleblower - GOV.UK \(www.gov.uk\)](#), by contacting the relevant [Whistleblowing: list of prescribed people and bodies - GOV.UK](#).
- **Canada:** Depending on the industry/sector and Misconduct, there are various federal and provincial regulatory bodies that can be contacted, including the Competition Bureau Canada [Protection for whistleblowers](#), Ontario [OSC Whistleblower Program | OSC](#), or Canada Revenue Agency [Reporting suspected tax or benefit cheating in Canada – Overview - Canada.ca](#). We encourage any Whistleblower in Canada to seek independent legal advice if unsure, and before taking any further action.

In cases where the Whistleblower believes public interest is at stake, or if the disclosure of Misconduct involves potential criminal activity, it is advised to report the Misconduct directly to the relevant regulatory body.

3 Confidentiality and protection

A Whistleblower may remain anonymous when reporting any Misconduct, including by using a pseudonym. This applies irrespective of whether the report is made to the Authorised Persons, Whistleblower Hotline or a regulatory body.

The anonymous Whistleblower will still qualify for protection under Whistleblower Laws. There is no requirement to identify yourself at any stage during the reporting or investigation process. You may also refuse to answer questions that you feel may reveal your identity. If disclosing anonymously, please provide as much information about the Misconduct as possible.

If the Whistleblower is identified, Nous will protect any Eligible Whistleblower under this policy. Nous will not disclose the identity of anyone who comes forward to report Misconduct beyond the Authorised Persons, unless we have the Whistleblower's express consent to do so, or as required by law.

Any reports and information will be handled confidentially (to the extent permitted by law), consistent with Nous' obligation to investigate and address the reported Misconduct. Any third party involved (including external investigators and advisors, or individuals who contribute information to an investigation) will be subject to strict confidentiality obligations. A Whistleblower may make a report outside standard business hours.

Nous will not tolerate any form of Detrimental Conduct against any Whistleblower for making a report under this policy, or against any other individual who may be involved in any resulting investigation.

If any Whistleblower feels that they have experienced Detrimental Conduct in connection with a report or investigation, they should contact Nous' General Counsel and legal team directly (by emailing legal@nousgroup.com).

If you believe your report or any resulting investigation has been improperly handled, please contact Nous' General Counsel and legal team and/or seek external legal advice. Engaging with legal professionals can inform Whistleblowers of their rights and any potential remedies.

For information on how Nous uses any personal information collected in connection with any Whistleblower report or investigation, refer to [Nous Group's privacy policy](#).

4 Investigation process

1. Investigation process by Nous

Nous will investigate all reports of Misconduct made under this policy in a fair and objective manner, with consideration for everyone involved in the reporting process. Everyone will be treated fairly, and with due process, and no assumptions will be made during the investigations.

Nous may seek further advice from an external / independent firm or contractor, as appropriate.

If there is a risk that an internal investigation cannot be conducted fairly or objectively, an external / independent investigator will be appointed.

Nous will conduct the investigation in three stages:

	The process	Who will be involved
Stage 1 - Preliminary review	Authorised Persons / General Counsel and legal team will review and consider the Whistleblower report within 2-3 business days of its receipt, including to determine whether it meets the definition of a Protected Disclosure, and the extent of further investigation required.	If the Whistleblower has identified themselves, the Whistleblower may be contacted to provide further details.
Stage 2 - Resourced investigation	Authorised Persons / General Counsel and legal team will commence an investigation which may include the following: • Reviewing evidence (e.g., emails and other forms of communication, invoices, financial information, other relevant documentation, access logs and/or metadata). • Contacting any persons who might have been involved or observed the Misconduct, and ensuring that it would not result in any Detrimental Conduct for those persons or the Whistleblower.	Authorised Persons / General Counsel and legal team will conduct the investigation and may appoint an external / independent firm to assist with the investigations and provide professional advice. Nous may request further information from the Whistleblower and any other persons concerned. If any illegal or criminal activity is suspected, subject to independent advice and in accordance with applicable Whistleblower Laws, Nous may involve law enforcement authorities or regulatory bodies.

Stage 3 - Findings and reporting

Authorised Persons / General Counsel and legal team will prepare a report based on the investigation and findings.

Authorised Persons / General Counsel and legal team will report back to the Whistleblower once the investigation has concluded.

If illegal or criminal activity is suspected, subject to independent advice and in accordance with applicable Whistleblower Laws, Nous may be required to issue the report to law enforcement authorities or regulatory bodies.

If any Authorised Person/s is the subject of a Whistleblower report, that Authorised Person/s will not be involved in the investigation and will not receive any information about the investigation, other than to the extent required / appropriate to support the investigation and its findings.

2. Investigation process where disclosure made to Whistleblower Hotline

All reports to the Whistleblower Hotline will be received and acknowledged by the Independent Hotline Provider.

The information provided by the Whistleblower will be securely transmitted by the Independent Hotline Provider to the Authorised Persons for further investigation and action in accordance with the process described in section 4(1) (Investigation process by Nous) above.

If the Whistleblower requests to remain anonymous, the Whistleblower's identity will not be disclosed to the Authorised Persons or Nous, unless required by law.

Whistleblowers may request updates on the progress of their investigation through the Whistleblower Hotline.

3. Investigation process where disclosure made to a regulatory body

Where a Whistleblower makes a report directly to a regulatory body, Nous will co-operate with the regulatory body's investigation, and provide any necessary information to support that investigation, to the extent required by applicable Whistleblower Laws.

5 Further information

For further information, please contact governance@nousgroup.com.

6 Policy details table

Policy Owner	Warrick Louey, General Counsel
Authorised by	Timothy Orton, Managing Principal and CEO
Last Updated	August 2026
Related Documents	Conflict of Interest Policy, Supplier Code of Conduct, Modern Slavery Policy (found here).