1. What is the objective of this Policy

Origin encourages the reporting of any instance or suspicion of misconduct or an improper state of affairs or circumstances involving its businesses and provides protections and measures so that reports can be made confidentially and without fear of reprisal, victimisation or detriment.

This Policy sets out:

- how a person may report whistleblower concerns and be protected from reprisal, victimisation or detriment; and
- Origin's process for investigating and responding to whistleblower concerns.

2. Who this applies to

This Policy applies to all Directors, employees and people working for Origin under a contract or consultancy agreement (**Origin Personnel**).

In addition, the protections under this Policy extend to all Eligible Whistleblowers who make a report under this Policy. **Eligible Whistleblowers** are:

(a) current and former employees and officers of a company in the Origin group of companies (**Origin Company**);
(b) current and former suppliers and service providers to an Origin Company or their employees;
(c) current and former associates of Origin (including a person with whom any Origin Company acts in concert); and
(d) relatives, dependents, or dependents of the spouse of an individual referred to in (a) to (c) above.

3. Requirements

Origin Personnel are expected to speak up and report improper conduct in accordance with the Code of Conduct and Origin's Values. Origin will protect the interests of an Eligible Whistleblower who makes a report in accordance with this Policy.

Eligible Whistleblowers who make a report about a Disclosable Matter to an Eligible Recipient can also receive whistleblower protections at law, further information is outlined in Attachment 1.

Disclosable Matter

The disclosure is a Disclosable Matter if an Eligible Whistleblower has reasonable grounds to suspect misconduct or an improper state of affairs or circumstances in relation to an Origin Company, including:

- an illegal activity or breach of a relevant law, licence, code or regulation;
- conduct considered dangerous to the public or to the financial system; or
- any other misconduct, including fraud, negligence, corruption, false accounting, misappropriation of funds and collusion with customers or suppliers.

Disclosable Matters do not have to involve unlawful conduct.

This Policy, and its related protections, does not generally apply to disclosures that are solely related to personal work-related grievances, in which case Origin's Speaking Up Standard applies. See Attachment 1 for further detail.

Eligible Recipients

Origin requests that concerns be reported to:

- Origin's ConcernLine (contact details are provided in Attachment 1);
- the General Manager Internal Audit; or
- the Company Secretary.

Matters may also be raised with an officer or senior manager of Origin, which includes a Director, a member of the Executive Leadership Team (**ELT**) or one of their direct reports, or an auditor or actuary of Origin.

Together, these are Eligible Recipients of whistleblower reports for Origin. To qualify for protections under law, Eligible Whistleblowers must report any concern directly to an Eligible Recipient, see the table in Attachment 1 ('recipient of disclosed information').

Handling a Disclosure

Origin's response to a disclosure will vary depending on the nature of the disclosure and the amount of information provided. To ensure fair treatment: (i) All disclosures will be investigated in a timely and confidential manner by appropriately trained people. Where appropriate, a formal process will be followed; and (ii) Origin Personnel identified in a disclosure and / or against whom a disclosure is made, will be provided with an opportunity to respond where appropriate.

Origin will provide disclosers with regular updates, including through anonymous channels where appropriate.

While anonymous disclosures will also be investigated and subject to the protections under this Policy, choosing to remain anonymous may impact Origin's ability to properly investigate the matters raised, provide updates and monitor the Eligible Whistleblower's wellbeing. If the report is not anonymous, with the consent of the Eligible Whistleblower, Origin will be able to take action to support their wellbeing and safeguard their interests.

If required, Origin staff members and their family also have 24/7 access to the Employee Assistance Program.

Protection of Eligible Whistleblowers

(a) Protection from Detrimental Conduct

Origin Personnel must not engage in and must protect Eligible Whistleblowers from any actual or threatened detrimental conduct as a result of the disclosure. A threat may be express or implied or conditional or unconditional.

Examples of the kinds of detrimental conduct which Eligible Whistleblowers will be protected from include dismissal, changes to employment or terms of employment, harassment or intimidation, and damage to property or reputation.

Origin will assess the risk of detriment and will make practical protections and support available to the Eligible Whistleblower depending on the circumstances.

If an Eligible Whistleblower has been subject to actual or threatened detrimental conduct, they should inform the ConcernLine or an Eligible Recipient.

(b) Protection of Identity

Origin Personnel (including the Eligible Recipient of the disclosure) must keep the identity of the Eligible Whistleblower or information likely to reveal their identity confidential and disclose only:

- with consent of the Eligible Whistleblower,
- if it is reported to a relevant regulator or otherwise authorised by law; or
- if it is raised with a lawyer for the purpose of obtaining legal advice or representation about the whistleblower protection laws.

Origin Personnel may disclose non-identifying information (for example, by redacting personal information) where reasonable steps have been taken to reduce the risk that the Eligible Whistleblower will be identified, and the disclosure is for the purpose of investigating the matter or reporting to the Board or ELT.

Origin Personnel must keep information regarding a disclosure confidential and securely stored in accordance with Origin's information security processes and Privacy Policy.

Access to Policy and training

This Policy is available via both Origin's public website and intranet.

Origin Personnel must familiarise themselves with this Policy by undertaking mandatory Code of Conduct training. Origin's Eligible Recipients must undertake additional training on their responsibilities under this Policy to receive concerns, maintain confidentiality and provide an environment that protects Eligible Whistleblowers from victimisation, reprisal or detriment.

Suppliers and service providers will be made aware of the ConcernLine process through Our Supplier Code.

4. Roles and Responsibilities

The roles and responsibilities in relation to this Policy are set out in the table below:

POSITION	RESPONSIBILITIES
Board (Policy approver)	• Approving any material change to this Policy. • Receiving reports of any material breach of this Policy.
General Manager, Corporate, Disputes and Regulatory Legal & Group ES&O and LPG Compliance (Policy Owner)	• Receiving reports of breach, overseeing investigation and management of consequences, and reporting any material breach to the Board. • Reviewing this Policy as needed, and at least every three years. • Communicate the requirements of this Policy and arrange appropriate training. • Making sure this Policy is available on Origin's public website.

5. Compliance

A breach of this Policy by Origin Personnel is a serious misconduct and may result in dismissal. Breach of whistleblower laws may also expose an entity or person to civil or criminal legal liability.

6. Contacts & More Information

Document Owner	General Manager, Corporate, Disputes and Regulatory Legal & Group ES&O and LPG Compliance
Effective from	February 2025
Next Review due	February 2028

Attachment 1 – Whistleblower laws

Legal Protections

Certain information that is disclosed to certain people is protected by law (even if that disclosure did not follow the processes in this Policy). Examples are outlined in the table below.

Information reported or disclosed	Recipient of disclosed information

General Disclosable Matters
• Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to an Origin Company
• Information that an Origin Company or any officer or employee of an Origin Company has engaged in conduct that:
  ○ contravenes or constitutes an offence against certain legislation (e.g. the Corporations Act);
  ○ represents a danger to the public or the financial system; or
  ○ constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more
	Recipients for any general Disclosable Matters
	• A person authorised by Origin to receive protected disclosures
	• An officer or senior manager of an Origin Company
	• An auditor, or a member of an audit team conducting an audit, of an Origin Company
	• An actuary of an Origin Company
	• ASIC, APRA or another Commonwealth body prescribed by regulation
	• A legal practitioner for the purpose of obtaining legal advice or legal representation about the operation of the whistleblower provisions

Tax-related Disclosable Matters • Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Origin or an associate, which the employee considers may assist the recipient to perform functions or duties in relation to the tax affairs of Origin or an associate	**Recipients for any tax-related Disclosable Matters** • A person authorised by Origin to receive reports of tax-related Disclosable Matters • An auditor, or a member of an audit team conducting an audit, of Origin • A registered tax agent or BAS agent who provides tax services or BAS services to Origin • A director, secretary or senior manager of Origin • An employee or officer of Origin who has functions or duties that relate to the tax affairs of Origin • A legal practitioner for the purpose of obtaining legal advice or legal representation about the operation of the whistleblower provisions
Further tax-related information Information that may assist the Commissioner of Taxation to perform his or her functions or duties under a taxation law in relation to Origin	**Recipients for any further tax-related information** • Commissioner of Taxation • A legal practitioner for the purpose of obtaining legal advice or legal representation about the operation of the whistleblower provisions

The law also protects certain disclosures made in "emergency" and "public interest" situations, in which case disclosures can be made to a journalist or a parliamentarian under certain circumstances.

People wishing to make a disclosure should contact Origin's Company Secretary or seek their own independent legal advice if they would like more information about the types of disclosures under the *Corporations Act 2001* (Cth) or *Tax Administration Act 1953* (Cth).

The legal protections do not grant immunity for any misconduct an individual has engaged in that is revealed in the disclosure.

Personal work-related grievances

Legal protection for disclosures solely about personal work-related grievances are not covered by the whistleblower protections.

However, disclosure of a personal work-related grievance may still be protected if:

- the person suffers, or is threatened with, detriment for making the disclosure;
- the disclosure includes information about misconduct, an improper state of affairs or circumstances, a breach of the law, or danger to the public or the financial system, in addition to the personal work-related grievance; or
- the disclosure suggests misconduct that has significant implications for the company beyond the discloser's personal circumstances.

Additional protections under the law

Additional legislative protections may also be available. For example:

- compensation for loss, damage or injury suffered as a result of detrimental conduct;
- an injunction from a court to prevent, stop or remedy the effects of the detrimental conduct or any other order the court thinks appropriate;
- protection from contractual or other remedies being sought against an individual on the basis that they made the report; and
- not subjecting the individual to civil, criminal or administrative liability for making the disclosure.

ConcernLine

Origin's ConcernLine is an external service that offers:

- telephone, email, web-based and facsimile reporting options, available at all times;
- the choice to have the concern dealt with in confidence or to remain anonymous; and
- the option for individuals to follow up their concerns, even if they remain anonymous to Origin.

ConcernLine	
Telephone	1800 780 104 / +61 3 6111 3588
Website	www.originconcernline.deloitte.com.au
Email	originconcernline@deloitte.com.au
Fax	+61 3 9691 8182
Mail	Origin ConcernLine, Reply Paid, 12628 A'Beckett Street, Victoria 8006