

Purpose

The Stride Foundation is committed to promoting a culture of exemplary corporate citizenship observing the highest standards of integrity and ethical behavior in all our business activities.

The purpose of this Policy is to encourage employees, volunteers, contractors, customers and other stakeholders to raise concerns and report instances of unethical, illegal, fraudulent or undesirable conduct, where there are reasonable grounds to suspect such conduct, without fear of intimidation, disadvantage or reprisal.

This Policy complements normal reporting and communication channels within Stride Foundation and provides an alternative means of reporting alleged or suspected wrongdoing where the usual channels appear to have failed or may be inappropriate.

Scope

This Policy is intended to encourage employees, contractors, volunteers and other stakeholders to report any issues that they believe fall into the category of "Reportable Conduct".

"Reportable Conduct" covered by this Policy includes any conduct of a director, officer, employee, volunteer, contractor or third party, whether actual or suspected, which the person making the report honestly believes:

- is dishonest, fraudulent or corrupt;
- is illegal, such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of law;
- is unethical or in breach of Stride Foundation policies such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching Stride Foundation Code of Conduct or other policies or procedures;
- is potentially damaging to Stride Foundation, a Stride Foundation employee or a third party, such as unsafe work practices, environmental damage, health risks or substantial wasting of company resources;

- is an abuse of authority;
- may cause financial loss to Stride Foundation or damage its reputation or be otherwise detrimental to Stride Foundation interests;
- involves any other kind of serious impropriety; or
- constitutes harassment, discrimination, victimisation or bullying.

Reference

PP 006 – Code of Conduct

Procedure

Any employee or volunteer who detects or has reasonable grounds for suspecting Reportable Conduct is encouraged to immediately raise the matter with their direct manager through normal reporting channel. Customers, contractors and other stakeholders are encouraged to raise the matter directly with the CEO.

If the person does not believe reporting through normal channels is appropriate given the circumstances, the report may be made directly to Stride's Whistleblower Protection Officer. This reporting avenue could be used where the person reasonably believes any of the avenues involving Stride Foundation management would not provide an independent assessment and/or investigation and that the allegation ought to be handled external to management. This avenue is generally only appropriate in the instance of alleged or suspected wrongdoing involving senior management.

The Whistleblower Protection Officer designated to receive reports of alleged or suspected wrongdoing is the Chairman of the Board or nominee.

Investigation

Stride Foundation will investigate all cases of Reportable Conduct made under this Policy as soon as possible after the matter has been reported and will, where appropriate, provide feedback to the Whistleblower regarding the investigation's progress and/or outcome (subject to legal considerations and

the privacy of those against whom allegations are made).

If following an investigation, Stride deems that no action will be taken, the Whistleblower will be provided with reasons why the matter will not be taken further.

Confidentiality of whistleblower's identity and whistleblowing reports

If a person makes a report of alleged or suspected wrongdoing under this policy, Stride Foundation will endeavour to protect that person's identity from disclosure. This may not occur if confidentiality is not a practical option.

Generally, Stride Foundation will not disclose the person's identity unless:

- the person making the report consents to the disclosure;
- the disclosure is required or authorised by law, and/or
- the disclosure is necessary to further the investigation.

Wherever possible reports made under this policy will be treated confidentiality. However, when a report is investigated it may be necessary to reveal its substance to people such as other Stride Foundation personnel, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies.

At some point in time it may also be necessary to disclose the fact and the substance of a report to the person who is the subject of the report. Although confidentiality is maintained, in some circumstances, the source of the reported issue may be obvious to a person who is the subject of a report.

Stride Foundation will take reasonable precautions to store any records relating to a report of wrongdoing securely and to permit access by authorised persons only.

Unauthorised disclosure of information relating to a report, the identity of the person who has made a report of wrongdoing or information from which the identity of the reporting person could be inferred, will be regarded seriously and may result in disciplinary action, which may include dismissal.

Duties of whistleblowers

Stride Foundation relies on employees to help achieve its commitment to a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

It is a fundamental employment obligation that employees who become aware of known, suspected, or potential cases of Reportable Conduct make a report.

Whistleblower Protection Officer

The Whistleblower Protection Officer has access to independent financial, legal and operational advisers as required.

The Whistleblower Protection Officer is responsible for receiving reports and inquiring into the substance of reports. On the basis of sufficient evidence in support of matters raised in a report, the Whistleblower Protection Officer determines whether to refer reports for further action.

The Whistleblower Protection Officer must ensure that the Whistleblower is kept informed of the outcomes of the investigation, subject to the considerations of privacy of those against whom the allegations are made.

Stride Foundation aims to ensure all employees are continuously aware of who the Whistleblower Protection Officer is and their contact details.

Anonymous reporting

Anonymous reports of wrongdoing have significant limitations that inhibit a proper and appropriate inquiry or investigation and are not encouraged.

Trivial or vexatious reports

This policy is intended to apply to reports of alleged or suspected wrongdoing which is serious in nature. The policy must not be used for trivial or vexatious matters.

Investigation of the report

All reports of alleged or suspected wrongdoing made under this policy will be properly assessed, and if appropriate, independently investigated with the objective of locating evidence that either substantiates or refutes the claims made by the Whistleblower.

The Whistleblower Investigation Officer will be responsible for ensuring the proper conduct of the investigation. The investigation will not be conducted by a person who may be the subject of the investigation or has inappropriate links or connections (actual or perceived) to the person(s) or practice(s) under investigation.

Investigation Officer

The Whistleblower Protection Officer may appoint an investigation officer. Investigations must be conducted in a fair and independent manner. This means investigations must be independent from the business unit concerned, the Whistleblower and any person who is the subject of the report.

Management of a person against whom a report is made

Stride Foundation recognises that individuals against whom a report is made must also be supported during the handling and investigation of the report. Stride Foundation will take reasonable steps to treat fairly the person who is the subject of a report, particularly during the assessment and investigation process.

Reporting procedures

The Whistleblower Protection Officer will report at least annually to the Board of Directors on Whistleblower incidents.

Reports will include:

- a summary of Reportable Conduct incident reports, their status and action being taken;
- make any recommendations, as appropriate.

Serious and/or material Reportable Conduct will be immediately referred to the Chairman of the Board.

Policy implementation

Responsibility for implementation of this policy is delegated to the Chief Executive Officer.

Amendment to this policy

This Policy can only be amended with the approval of the Stride Foundation Board of Directors.