



Whistleblower Policy

Pay Later Group Limited

June 2021

What is the purpose of this policy?

The purpose of this policy is to encourage and support the reporting of suspected or actual misconduct, as well as unlawful activity. Our team is our top priority at Pay Later Group Limited. A safe and supportive environment in which all team members are respected and supported is critical to our long-term success. It is important that individuals are encouraged to "speak up" when they see inappropriate behaviour or illegal activity. At Pay Later Group Limited, we always do the right thing.

Who does this policy apply to?

This policy relates to Pay Later Group Limited and its subsidiaries and applies to all current and former employees, directors, contractors, consultants and third-party supplier employees as well as the relatives and dependents of these individuals (you). A person who reports this type of misconduct is known as a whistleblower.

Speaking up

We encourage you to speak up and disclose any suspected or actual wrongdoing. We will protect you when you speak up. You don't need to identify yourself and can speak up confidentially, if you like. If you do give your name, we will not share your identity with anyone else unless you agree or the law allows or requires it (e.g. in dealings with a regulator).

How do you speak up?

You can contact whistleblowing@flynowpaylater.com or the Group Head of Compliance.

What disclosures are protected?

It is important that we know about anything affecting our business so that we can address any risks to our employees, customers, business or reputation. You are encouraged to speak up if you have reasonable grounds to suspect misconduct or improper activity involving any Pay Later Group Limited company or subsidiary or team members (Potential Misconduct). This includes breaches of the law, our Code of Conduct or other company policy, and anything else you reasonably believe to be harmful, dishonest or unethical. Examples are:

- Fraud, dishonesty, theft
- Bribery, money laundering, corruption, secret commissions
- Illegal activity (i.e. drug sale/use, violence, threatened violence, or criminal damage)
- Abuse of authority • Breach of employment, labour, workplace safety or any other laws
- Conduct that damages Fly Now Pay Later's brand, reputation or relationships with others
- Conflict of interest
- Anything that is a safety risk
- Disclosure of confidential information
- Inappropriate conduct (i.e. dishonest altering of company records or data)

- Any other kind of serious impropriety

How are you protected?

We are committed to protecting anyone that speaks up by:

- protecting your identity – we will not share your identity (or information that is likely to lead to your identity) unless you give your consent or it is allowed or required by law;
- ensuring fairness – we are committed to ensuring you are treated fairly and you are not discriminated against or disadvantaged for speaking up. As part of this commitment, we will monitor and manage the behaviour of other employees; and
- providing support – we will take all reasonable steps to ensure that adequate and appropriate support is provided to you.

If you have any queries or concerns regarding the protections available to you, please contact an executive committee member. The Executive Committee is also in operation as the Whistleblower Protection Officer. Any team member (including a person you have reported to) that discloses your identity without your agreement (unless permitted by law) or harms you or others because of your disclosure may face disciplinary action under Pay Later Group’s Global Disciplinary Policy up to and including dismissal.

Investigations

How disclosures are investigated

Your concerns should have reasonable grounds. You are encouraged to make a report even if your concerns turn out to be incorrect. When we investigate a report, we focus on the substance of the disclosure and not the motives behind why it was made. The Whistleblower Protection Officer will acknowledge receipt of the information you have disclosed and keep you informed of the progress of the investigation if possible.

The Whistleblower Protection Officer will decide if the information you have disclosed warrants investigation or verification and may take further action. Investigations are conducted fairly, independently (without bias) and in strict confidence.

When possible and appropriate, a person being investigated will have an opportunity to respond to the information in the report that involves them. Fly Now Pay Later is committed to protecting the wellbeing, and ensuring the fair treatment, of all its employees, including those who are mentioned in disclosures made under this policy. If any employee requires additional support in relation to responding to an investigation or allegation, they may contact the Whistleblower Protection Officer (whistleblower@flynowpaylater.com).

Version Control

Version	June 2021
Policy owner	Executive Committee
Review cycle	Periodically