



SEE SOMETHING? SAY SOMETHING! POLICY

1. Purpose

CAR Group Limited (“CAR Group” or the “Company”) is committed to conducting business with honesty and integrity across all its operations globally and expects all employees to maintain the high standards guided by CAR Group’s Code of Conduct. We believe in fostering a workplace culture of open communication and transparency. All our work environments should be free from bullying, harassment, unsafe, unfair or unethical workplace practices.

However, CAR Group acknowledges that all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. For that reason, it is vital to have a procedure where people can report such conduct in a safe manner.

A culture of openness and accountability is essential to prevent illegal or unethical situations occurring or to address them when they do occur. The aims of this policy are:

- To encourage employees to report suspected wrongdoing as soon as possible with the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their anonymity will be protected.
- To provide employees with guidance on how to raise concerns.
- To reassure employees that they can raise genuine concerns without detrimental treatment and with protection from victimisation.
- Provide Whistleblowers with an understanding of how disclosures will be handled.

Individuals within the organisation who choose not to utilise whistleblower protections have multiple avenues to raise concerns as outlined in section 4 of this policy.

For members of the public, outside our organisation, a disclosure can be made via the Whistleblower process detailed from section 5 of the policy.

2. Scope

This policy applies to CAR Group as well as its subsidiaries / owned companies, and each of their employees, directors, officers and contractors globally, including volunteers and Eligible Whistleblowers (as defined by the legislation and detailed in this policy at Section 7).

Nothing in this policy is intended to diminish any additional or alternative protections, which may be available at law.

3. Accountability to report

All CAR Group employees, officers, contractors, suppliers and volunteers globally have a legal obligation to uphold relevant laws and comply with CAR Group policies and procedures.

These obligations bring with them a responsibility to also report any suspicion or observed breach of law, misconduct or action that represents a danger to the public, as well as any breaches of CAR Group policies.

4. How to raise a matter

If you are a member of our CAR Group team and wish to raise a matter internally and you do not wish to do this via the whistleblowing service, you can:

- Talk directly to your line manager or an executive leaderships team member in your business.
- Speak with your People and Culture Team.
- Email the internally monitored email: seesomethingsaysomething@cargroup.com

If you raise a matter through any of these channels, your confidentiality will be maintained as much as possible within the constraints of needing to investigate the matter raised. Please refer to your internal Grievance and Disciplinary Policy or Procedure for details on how an investigation of this nature will be conducted.

5. Policy relationship to Australian whistleblower obligations

This policy has been written in accordance with the Treasury Laws Amendment (Enhancing Whistleblower Protections) Bill 2017 that updated and aligned Australian laws in relation to whistleblowing provisions and protections contained in the following legislation:

- Corporations Act 2001
- Taxation Administration Act 1953
- Banking Act 1959
- Insurance Act 1973
- Life Insurance Act 1995
- Superannuation Industry (Supervision) Act 1993

While this policy is written in accordance with Australian law, it applies to all CAR Group operations globally. This policy is not intended to diminish any local Whistleblowing laws or regulations, and where the protections provided in this policy are greater than local laws, this policy shall prevail.

6. What is whistleblowing?

'Whistleblowing' is the disclosure of information that relates to suspected misconduct or an improper state of affairs.

A 'Whistleblower' is a person who makes a disclosure.

Whistleblowing should not be used for personal work-related grievances or matters not covered in this policy, unless relating to the victimisation of a Whistleblower. Personal work-related grievances or other matters not covered in this policy, should be dealt with under your local Grievance and Disciplinary policy or process.

7. Protected Disclosures - whistleblowing

A disclosure will be considered 'protected' provided:

- The disclosure is made by an Eligible Whistleblower, as defined by the Corporations Act 2001 and set out below;
- The disclosure is made regarding CAR Group;
- The disclosure is made to an Eligible Recipient as defined by the Corporations Act 2011 and set out below; and
- The discloser must possess reasonable grounds to suspect the information they are disclosing concerns 'misconduct' or an 'improper state of affairs or circumstances' in relation to CAR Group.

a) Eligible Whistleblower

An individual is an eligible whistleblower, if the individual is or has been any of the following:

- An officer of CAR Group;
- An employee of a CAR Group operating company;
- An individual who supplies service or goods to CAR Group;
- An employee of someone who supplies services or goods to CAR Group;

- An associate of CAR Group; or
- A spouse, relative or dependant of one of the above.

b) Eligible Recipients

Disclosures can be made to the following Eligible Recipients:

- An officer or senior manager of CAR Group. This means a CAR Group Global Leadership Team Member (GLT) or in-country leadership team member.
- A person authorised by CAR Group to receive disclosures. At CAR Group this is EGM – People at carsales.
- An auditor or member of the audit team conducting an audit of any member of CAR Group; or
- An actuary of CAR Group.

CAR Group have appointed Deloitte to take disclosures on its behalf globally, so Whistleblowers are encouraged to report any disclosures using the *Whistleblower Hotline @CARGROUP*

Details of this service are listed in section 8 of this policy.

c) Disclosable matters

A protected disclosure can be made regarding any information that concerns misconduct or an improper state of affairs in relation to CAR Group. Disclosable matters include information that indicates CAR Group (or an officer or employee) has engaged in conduct contravening legislation.

CAR Group encourages all parties to make disclosures relevant to this policy to CAR Group in the first instance using the *Whistleblower Hotline @CARGROUP* .

Disclosable matters include any conduct that includes, but is not limited to:

- Dishonest behaviour, corrupt or illegal activities.
- Fraudulent activity, theft, money laundering or misappropriation.
- Unlawful, corrupt or irregular use of Company funds or practices.
- Offering or accepting a bribe.
- Unethical conduct, including anything that would breach the CAR Group Code of Conduct;
- Improper or misleading accounting or financial reporting practices.

- A breach of any legislation relating to CAR Group operations or activities.
- Behaviour that is oppressive, discriminatory or grossly negligent.
- Any behaviour that poses a serious risk to the health and safety of any person in the workplace, in public or in the environment.
- Any instruction to cover up or attempt to cover up serious wrongdoing.
- Any other conduct that may cause loss to CAR Group or be otherwise detrimental to the interest of CAR Group.

If the matter relates to imminent danger to human safety, local emergency services should be called.

8. Making a disclosure - Whistleblowing

Protected disclosures can be made to recipients in section 7b of this policy.

CAR Group encourages all disclosures to be made to CAR Group in the first instance by using the Independent Whistleblower Service. The Independent Whistleblower Service known as the *Whistleblower Hotline @CARGROUP* is supported by Deloitte and allows employees to submit anonymous or named disclosures.

You can access the *Whistleblower Hotline @CARGROUP* through:

Australia

- Dedicated hotline number: 1800 844 930 (Australia only)
- Website: www.cargroup.deloitte.com.au

South Korea, Chile, United States, Brazil or any other location outside Australia:

- Website: www.cargroup.deloitte.com.au

Any disclosures made through the *Whistleblower Hotline @CARGROUP* will be reviewed by a Deloitte investigator and the summarised information will be provided to a designated person at CAR Group for investigation, follow up or corrective action.

You may also make a disclosure directly to an eligible recipient of CAR Group. If this occurs, the eligible recipient will notify the designated person at CAR Group responsible for investigation, follow up or correct action. If you chose to make a disclosure to an eligible recipient directly your privacy and anonymity will still be protected if you request this.

Under legislation you may also have the right to make public interest disclosure to regulators, members of parliament and the media.

9. Protection of Whistleblowers making a disclosures

When a Whistleblower has not given express consent to have their identity known, CAR Group must:

- Keep confidential the identity of anyone suspected or known to have made a whistleblowing disclosure.
- Ensure Whistleblowers that have come forward are never subjected to detrimental or adverse treatment because of reporting misconduct.

Eligible Whistleblowers reporting disclosable matters may also be protected more generally under the law from a range of secondary liabilities.

10. Whistleblowers implicated in the acts they disclose

The act of whistleblowing should not shield Whistleblowers from the reasonable consequences flowing from any involvement they may have had in the improper conduct being reported or disclosed.

A person's liability for their own conduct is not affected by the person's disclosures of that conduct.

11. Investigation and outcome – whistleblower

Once CAR Group has been alerted that a disclosure has been made, it will carry out an initial assessment to determine the scope of any investigation. A suitable investigator will be appointed to conduct any required investigations.

We will aim to keep a Whistleblower informed of the progress of the investigation. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. A Whistleblower should treat any information about the investigation as confidential.

If a disclosure is made anonymously, we may not be able to keep the Whistleblower informed of the investigation process.

If we conclude that a Whistleblower has made false allegations maliciously, without reasonable grounds to suspect misconduct or with a view to personal gain, the Whistleblower may be subject to disciplinary action.

All investigations will be conducted in a fair and independent manner and all reasonable efforts will be made to preserve confidentiality of an investigation. To avoid jeopardising an investigation, an employee who has made a report under this policy is expected to keep the fact that a report has been made confidential, subject to any legal requirements.

12. Consequences for knowingly making false or vexatious reports

Whistleblowers are expected to have reasonable grounds for the claims made in their disclosures. Employees found to have knowingly made a false disclosure may be subject to disciplinary action.

13. Confidentiality of whistleblowers

The identity of a Whistleblower or any information which is likely to lead to their identification or which was obtained directly or indirectly because of the disclosures made by the Whistleblower will not be disclosed without the express permission of the Whistleblower.

It is noted that anonymity will not be contravened if the disclosure of information is reasonably necessary for the purpose of the investigation and all reasonable steps have been taken to reduce the risk that the Whistleblower will be identified.

14. Protection and support for whistleblowers

It is understandable that Whistleblowers are sometimes worried about possible repercussions. We encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

Employees must not suffer any detrimental treatment as a result of making a disclosure and CAR Group will ensure the fair treatment and support of anyone who makes a disclosure.

We are committed to protecting the anonymity of a Whistleblower and we endeavour to provide everyone the protection provided to Whistleblowers under the law.

Employees must not threaten or retaliate against Whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

15. Access to this policy

This policy is available on the Company's shareholder website and intranet, and forms part of the induction process for all employees globally.



This policy will be reviewed and updated as required due to business changes, legislative changes or at other times as deemed necessary.

Document and Version Control

Version	Date	Approval
9.0	June 2025	CAR Group Board of Directors