



CATAPULT

Whistleblower Policy

1. Introduction

- 1.1 The Catapult Whistleblower Policy (this **Policy**) reflects our continued commitment to promoting ethical and responsible decision making and actions by our people. We expect all our people to behave ethically, lawfully and in accordance with our Code of Conduct. Unethical, unlawful or undesirable conduct is referred to in this Policy as “Misconduct”.
- 1.2 The purpose of this Policy is to:
- (a) Promote an open and transparent culture within Catapult;
 - (b) Identify and stamp out Misconduct;
 - (c) Encourage persons to report an issue if they have reasonable grounds to suspect that Catapult or any officer, employee or agent of Catapult has not behaved ethically, has breached the law, has not complied with our Code of Conduct or has been involved in other misconduct, such as fraud or negligence;
 - (d) Provide a process for potential Whistleblowers to raise matters in the knowledge that the matters will be taken seriously and treated as confidential without the fear of reprisal or victimisation.

2. Scope and Application

This Policy applies to all reports of Misconduct (as defined by this Policy) relating to Catapult or an officer, employee or agent of Catapult.

This Policy does not apply to personal work-related grievances (such as an interpersonal conflict, decisions relating to promotions, decisions relating to terms and conditions of engagement, or decisions relating to suspensions and terminations of employment).

If this Policy differs from applicable law, Catapult will apply the applicable law to the extent of any inconsistency.

If you have any concerns about what is proper conduct, it is expected you will do the right thing and raise your concern with the appropriate Catapult person; in most cases, your immediate manager is the best person.

3. What constitutes misconduct

Misconduct for the purposes of this Policy is any conduct that is unethical, unlawful or improper, or the deliberate concealment of such conduct by Catapult or any officer, employee or agent of Catapult. It includes circumstances where the Whistleblower has reasonable grounds to suspect:

- (a) Financial irregularity, fraud or negligence;
- (b) Corruption, bribery or similar behaviour;
- (c) Unlawfulness or illegality;
- (d) Fraud or any improper state of affairs or circumstances in relation to Catapult or another person or the tax affairs of Catapult or another person;
- (e) Endangerment of the health and safety of others or otherwise conduct that creates a danger to the public or financial system;
- (f) Dishonest or other irregular dealings with customers and suppliers, or
- (g) An offence against any applicable law of the Commonwealth that is punishable by imprisonment for a period of 12 or more months.

Catapult encourages the reporting of all matters where there are reasonable grounds to suspect there has been Misconduct and the report is based on information that is directly known to the Whistleblower.



4. Who may be a Whistleblower

4.1 Anyone who makes a report about Misconduct in accordance with this Policy is a Whistleblower. A report can be made anonymously. A person may make a report under this Policy if the person:

- (a) Is or was an officer or employee of Catapult, including those who are employed by Catapult to work directly for customers and/or at customer sites;
- (b) Is or was an unpaid work participant or other Catapult site-based person. For example, work experience students, exchange workers, and employees of customers who work from a Catapult site;
- (c) Is or was an associate of Catapult as defined under the Corporations Act, such as any director or company secretary of Catapult;
- (d) Is or was a supplier, or employee of a supplier; this including independent contractors of Catapult; or
- (e) A relative or dependent of any individual referred to in any of the dot points above (this includes a spouse, parent, child, grandchild and sibling).

5. How to report

5.1 Internal reports to Catapult

- (a) Reports made to Catapult should be made to a Catapult Whistleblower Protection Officer (**WPO**), contact details set out below:

Whistleblower phone no.	+61 3 9095 8409	
Title:	General Counsel and Company Secretary	Chief People Officer
Email:	company.secretary@catapultsports.com	zoe.rumford@catapultsports.com
Post:	Catapult Sports 75-83 High Street Prahran Victoria 3181 Australia	Catapult Sports 75-83 High Street Prahran Victoria 3181 Australia

All reports received by phone, email or post (as listed above) are received by the WPO who is the General Counsel or Chief People Officer.

Reports may also be made to any Director or Senior Manager of Catapult.

5.2 Reporting outside Catapult

- (a) In the event you wish to report Misconduct to a person other than Catapult, you can make a report to:
 - (i) An auditor of Catapult;
 - (ii) The Australian Taxation Commissioner or a registered tax agent or BAS agent (for the case of tax-related matters only);
 - (iii) The Australian Securities and Investments Commission;
 - (iv) The Australian Prudential Regulation Authority;
 - (v) The Australian Federal Police;
 - (vi) A legal practitioner.



5.3 Confidentiality and anonymity

All reports of Misconduct made under this Policy will be treated in a manner that is confidential. Catapult will not reveal your identity unless you have provided consent or it is required by law, for example, if Catapult is required to disclose your identity to the Australian Federal Police, or to allow Catapult to obtain legal advice. Reports received anonymously are accepted.

6. Protection and Support

6.1 Protection against victimisation

Catapult is committed to providing a fair, supportive and protected process for all Whistleblowers. Catapult will ensure that measures are taken to protect you even if any report you make in accordance with this Policy is subsequently determined to be incorrect or is not substantiated.

Reprisals or threats of reprisals will not be tolerated by Catapult. Catapult will not and will ensure that its officers, employees and agents will not terminate, demote, suspend, threaten, harass or in any other manner discriminate or engage in detrimental conduct against an eligible Whistleblower because of a report under this Policy. Any Catapult officer, employee or agent who retaliates against an actual or potential Whistleblower, or other party involved in the process of reporting any Misconduct in accordance with this Policy, will be subject to disciplinary action. Catapult people are reminded that in certain circumstances, victimisation of Whistleblowers can constitute a criminal offence.

It is important for you to be aware that, in addition to this Policy, certain statutory protections and private rights are available to Whistleblowers under Australian legislation.

6.2 Support and Welfare

Catapult treats people's wellbeing as a priority. If you make a report to a WPO, the WPO will discuss it with you and take appropriate measures to ensure you are supported during the reporting and investigation process.

7. How Catapult investigates

All reports of Misconduct will be treated seriously and will be fully investigated. Investigations will be independent of any person(s) or business unit who is the subject of the report.

Investigations will be undertaken by a WPO, any delegate of Catapult approved by a WPO or by a third party. For example, external legal, tax or accounting advice may be required to assist in the investigation.

Where investigations substantiate an allegation, the matter will be dealt with in accordance with established administrative or disciplinary procedures. This may result in disciplinary action, including termination of employment for person(s) involved. Any matters of a criminal nature will be reported to the police and, if appropriate, other appropriate regulatory authorities.

The WPO will inform you of the outcome of the investigation, where it is appropriate.

7.1 Disciplinary Action

There will be no disciplinary action against you if your report was made in accordance with this Policy but is unable to be substantiated or is found to be untrue. You may be subject to internal disciplinary action if you are implicated in the Misconduct you report.

8. Fair Treatment

Catapult recognises that its employees who are involved in matters the subject of a report may also need support.



Catapult and the WPO will not disclose the identity of any individual who may be involved in the subject matter of a report, except as required by the assessment and investigation process and except as set out in this Policy.

Catapult will take steps so that at the appropriate time individuals who are involved in or directly affected by the report are:

- (a) Informed of the substance of the allegation(s);
- (b) Given a fair and reasonable opportunity to answer the allegation(s) before a final decision is made;
- (c) Informed as to the substance of any adverse comment that may be included in a report arising from the investigation;
- (d) Able to include their response in the investigator's report.

9. Related policies

9.1 The Catapult Code of Conduct can be accessed at:
www.catapultsports.com/investor/corporate-governance

10. Review

This Policy will be reviewed periodically to assess its effectiveness.

Approved by the Board: February 2021