



WHISTLEBLOWER POLICY

PURPOSE

The policy has been put in place to ensure any concerns raised regarding any misconduct or improper state of affairs or circumstances in relation to Playside's business are dealt with effectively, securely, appropriately, and in accordance with the Corporations Act 2001 (Cth) (the Act).

Playside encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving Playside's business and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimization or reprisal.

This policy will be provided to all employees of Playside upon commencement of their employment and will also be available via Employment Hero.

The policy is also available to persons outside the organization and can be accessed on Playside website.

SCOPE

This policy applies to any person who is, or has been, any of the following with respect to Playside:

- Employee;
- Officer;
- Director;
- Contractor (including sub-contractors and employees of contractors);
- Supplier (including employees of suppliers);
- Consultant;
- Auditor;
- Associate; and
- Relative, dependant, spouse, or dependant of a spouse of any of the above.

This policy is intended to apply to the above persons in all countries in which Playside operates a business.

REPORTABLE CONDUCT

You may make a report or disclosure under this policy if you have reasonable grounds to believe that a Company director, officer, employee, contractor, supplier, consultant or other person who has business dealings with Playside has engaged in conduct (Reportable Conduct) which is:

- Dishonest, fraudulent or corrupt;

- Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property);
- Unethical including any breach of Playside's policies such as the Code of Conduct;
- Oppressive or grossly negligent;
- Potentially damaging to Playside, its employees or a third party;
- Misconduct or an improper state of affairs;
- A danger, or represents a danger to the public or financial system;
- Harassment, sexual harassment, discrimination, victimization or bullying.

Any disclosures that do not fall within the definition of Reportable Conduct, will not qualify for protection under the Act. It will be at Playside's discretion whether it considers there is a reasonable suspicion that the Reportable Conduct is occurring and/or whether the conduct constitutes "misconduct or improper state of affairs" under the Act.

For the avoidance of doubt, Reportable Conduct does not include personal work-related grievances. A personal work-related grievance is a grievance about any matter in relation to a staff member's current or former employment, having implications (or tending to have implications) for that person personally and that do not have broader implications for Playside. Examples of personal work-related grievances are as follows:

- An interpersonal conflict between the staff member and another employee;
- A decision relating to the engagement, transfer or promotion of the staff member;
- A decision relating to the terms and conditions of engagement of the staff member;
- A decision to suspend or terminate the engagement of the staff member, or otherwise to discipline the staff member.

Personal work-related grievances should be reported to your Lead or P&C in accordance with Playside's Grievance Policy.

MAKING A DISCLOSURE

Playside relies on its employees maintaining a culture of honest and ethical behaviour. Accordingly, if you become aware of any Reportable Conduct, it is expected that you will make a disclosure under this policy.

There are several ways in which you may report or disclose any issue or behaviour which you consider to be Reportable Conduct.

Internal Reporting

You may disclose any Reportable Conduct to the Whistleblower Protection Officers listed below:

Human Resources Director

Lauren Dawe

0447 549 760

lauren@playsidestudios.com

Chief Financial Officer

Darren Briggs

Chief Financial Officer
0407 880 693
darren@playsidestudios.com

Anonymous reporting

<https://forms.wix.com/f/7110078771306168783>

You can make a disclosure outside of business hours by contacting the above Whistleblower Protection Officers via email.

You are also encouraged to contact the above Whistleblower Protection Officers to obtain any additional information you may require before making a disclosure or for any clarification regarding this policy.

If you are unable to use any of the above reporting channels, a disclosure can be made to an "eligible recipient" within Playside. Eligible recipients include:

- Officers;
- Directors;
- C-Suite Members;
- General Managers;
- Auditor or member of an audit team conducting an audit of Playside;

The Whistleblower Protection Officer or eligible recipient will safeguard your interests and will ensure the integrity of the reporting mechanism.

Anonymity

When making a disclosure, you may do so anonymously. It may be difficult for Playside to properly investigate the matters disclosed if a report is submitted anonymously and therefore Playside encourages you to share your identity when making a disclosure, however you are not required to do so.

Where a disclosure has been made externally and you provide your contact details, those contact details will only be provided to a Whistleblower Protection Officer with your consent.

Reporting to Regulators

You may also make a disclosure to the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) in relation to a Reportable Conduct. You will be covered by the protections outlined in this policy if you have reported your concerns to ASIC or APRA.

Reporting to a Legal Practitioner

You may choose to discuss your concerns with a legal practitioner for the purposes of obtaining legal advice or representation. You will be covered by the protections outlined in this policy if you have reported your concerns to a legal practitioner.

INVESTIGATION

Playside will investigate all matters reported under this policy as soon as practicable after the matter has been reported. The Whistleblower Protection Officer will investigate the matter and where necessary, appoint an external investigator to assist in conducting the investigation. All investigations will be conducted in a fair, independent and timely manner and all reasonable efforts will be made to preserve confidentiality during the investigation.

If the report is not anonymous, the Whistleblower Protection Officer or external investigator will contact you, by your preferred method of communication, to discuss the investigation process and any other matters that are relevant to the investigation.

Where you have chosen to remain anonymous, your identity will not be disclosed to the investigator or to any other person and Playside will conduct the investigation based on the information provided to it.

Where possible, the Whistleblower Protection Officer will provide you with feedback on the progress and expected timeframes of the investigation. The person against whom any allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond (unless there are any restrictions or other reasonable bases for not doing so).

To the extent permitted by law, the Whistleblower Protection Officer may inform you and/or a person against whom allegations have been made of the findings. Playside will document the findings in a report however any report will remain the property of Playside and will only be shared with you or any person against whom the allegations have been made if Playside deems it appropriate.

PROTECTION OF WHISTLEBLOWERS

Playside is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this policy.

Protection from Legal Action

You will not be subject to any civil, criminal or administrative legal action (including disciplinary action) for making a disclosure under this policy or participating in any investigation.

Any information you provide will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information.

Protection against Detrimental Conduct

Playside (or any person engaged by Playside) will not engage in 'Detrimental Conduct' against you if you have made a disclosure under this policy.

Detrimental Conduct includes actual or threatened conduct such as the following (without limitation):

- Termination of employment;
- Injury to employment including demotion, disciplinary action;
- Alternation of position or duties;
- Discrimination;
- Harassment, bullying or intimidation;
- Victimization;

- Harm or injury including psychological harm;
- Damage to a person's property;
- Damage to a person's reputation;
- Damage to a person's business or financial position; or
- Any other damage to a person.

Playside also strictly prohibits all forms of Detrimental Conduct against any person who is involved in an investigation of a matter disclosed under the policy in response to their involvement in that investigation.

Playside will take all reasonable steps to protect you from Detrimental Conduct and will take necessary action where such conduct is identified. If appropriate, Playside may allow you to perform your duties from another location or reassign you to another role (at the same level) or make other modifications to your workplace or your duties to protect you from the risk of detriment.

If you are subjected to Detrimental Conduct as a result of making a disclosure under this policy or participating in an investigation, you should inform a Whistleblower Protection Officer or eligible recipient in accordance with the reporting guidelines outlined above.

You may also seek remedies including compensation, civil penalties or reinstatement if:

- You suffer loss, damage or injury because of a disclosure; and
- Playside failed to take reasonable precautions and exercise due diligence to prevent any Detrimental Conduct.

Protection of Confidentiality

All information received from you will be treated confidentially and sensitively.

You will not be required to provide your name when making a disclosure. To make a disclosure on an anonymous basis, it is recommended that you use a pseudonym and contact the Whistleblowing Protection Officers in the manner outlined above.

SUPPORT AVAILABLE

Any employee who makes a disclosure under this policy or is implicated as a result of a disclosure that is made may access Playside's Employee Assistance Program (EAP) which is a free and confidential reimbursement of psychological services, viewed via confluence.

Where appropriate, Playside may also appoint an independent support person from the Human Resources team to deal with any ongoing concerns you may have.

You may also access third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636) for support.

OTHER MATTERS

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.

In so far as this policy imposes any obligations on Playside, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set out in an employee's written employment contract.

Playside may unilaterally introduce, vary, remove or replace this policy at any time.

Employees are encouraged to read this policy in conjunction with other relevant Company policies.

VERSION	VERSION.1 SEPTEMBER 2023
POLICY OWNER	CFO
REVIEW	1 YEAR