



TERRA FIRMA

WHISTLEBLOWER
POLICY



TERRA FIRMA EQUITY LIMITED

ACN 675 999 747

WHISTLEBLOWER POLICY

Terra Firma Equity Limited (ACN 675 999 747)

1. Purpose

Terra Firma Equity Limited (“Terra Firma”, “the Company”) is committed to fostering a culture of integrity, transparency and accountability.

This Whistleblower Policy (“Policy”) establishes procedures for:

- Reporting suspected misconduct
- Protecting whistleblower’s from retaliation
- Ensuring investigations are conducted fairly and confidentially
- Complying with the whistleblower protection provisions of the *Corporations Act 2001 (Cth)*

The Company encourages the reporting of wrongdoing without fear of reprisal.

2. Scope

This Policy applies to:

- Current and former employees
 - Directors and officers
 - Contractors and consultants
 - Suppliers and their employees
 - Associates of the Company
 - Relatives or dependants of any of the above
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3. What Can Be Reported?

Disclosable matters include misconduct or improper conduct in relation to Terra Firma, including:

- Fraud
- Corruption or bribery
- Financial misstatement
- Breach of the Corporations Act
- Breach of other Commonwealth laws
- Serious breaches of internal policies
- Unsafe work practices
- Environmental breaches
- Systemic governance failures

Personal work-related grievances that do not involve broader misconduct are generally not protected disclosures unless they relate to victimisation or systemic misconduct.

4. Who Can Receive a Disclosure?

Protected disclosures may be made to:

- A Director of Terra Firma
- The Company Secretary
- A senior manager
- The Audit & Risk Committee
- An external auditor
- ASIC
- APRA (where applicable)
- A legal practitioner for advice

The Company may establish an independent whistleblower reporting channel.

5. Anonymous Disclosures

Whistleblower's may make disclosures anonymously.

Anonymous reports will be treated seriously and investigated where sufficient information is provided.

6. Protection for Whistleblower's

Under the *Corporations Act 2001 (Cth)*, eligible whistleblower's are entitled to:

- Confidentiality of identity
- Protection from civil, criminal and administrative liability
- Protection from victimisation

It is illegal to:

- Identify a whistleblower
 - Threaten or cause detriment to a whistleblower
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7. Confidentiality

The Company will:

- Protect the identity of whistleblower's
- Restrict access to disclosed information
- De-identify reports where appropriate

Information may only be disclosed where permitted by law.

8. Protection from Detriment

Terra Firma prohibits:

- Dismissal
- Demotion
- Harassment
- Intimidation
- Discrimination
- Damage to reputation
- Any form of retaliation

Individuals who engage in victimisation may face disciplinary action.

9. Investigation Process

All disclosures will be:

1. Assessed promptly
2. Assigned to an appropriate investigator
3. Investigated fairly and independently
4. Escalated to the Board if material

The Company may engage external advisers where necessary.

10. Fair Treatment of Individuals Named in Reports

Persons named in a disclosure will:

- Be treated fairly
 - Be provided procedural fairness
 - Have confidentiality respected
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11. Reporting to the Board

Material disclosures will be reported to:

- The Audit & Risk Committee
- The full Board (where appropriate)

The Board oversees the effectiveness of this Policy.

12. Training & Awareness

The Company will:

- Promote awareness of this Policy
 - Provide training to managers
 - Ensure whistleblower protections are understood
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13. False Reports

Making a knowingly false report may result in disciplinary action.

However, individuals who make reports in good faith will not face consequences if allegations are not substantiated.

14. Policy Availability

This Policy will be:

- Published on the Company website
 - Available to employees and stakeholders
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15. Policy Review

The Board will periodically review this Policy to ensure compliance with legislative requirements.

Approved by the Board of Terra Firma Equity Limited ACN 675 999 747

25-February 2026

Terra Firma Equity Limited

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