



WHISTLEBLOWER POLICY

1. OVERVIEW

At Sports Entertainment Group Limited ("the Company") we are guided by our company values. These values are the foundation of how we conduct ourselves and interact with each other, our clients, members, supplies, shareholders and other stakeholders. The Group is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in our business activities.

2. OBJECTIVE

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

This policy will be made available on the Company website (www.sportsentertainmentnetwork.com.au) and in any other ways that will ensure that it is made available to persons to whom this policy applies.

3. SCOPE

This policy applies to the Sports Entertainment Group Limited and all its wholly owned subsidiaries ("the SEG Group"). This includes any person who is, or has been, any of the following with respect to the Group:

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

Customers and the general public are not covered under the scope of this policy.

4. REPORTABLE MISCONDUCT

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 the Group 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 the Company's policies such as the Code of Conduct;
- Oppressive or grossly negligent;
- Potentially damaging to the Company, 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, discrimination, victimisation or bullying.

For the avoidance of doubt, Reportable Conduct does not include personal work-related grievances. These grievances should be reported to your manager. 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 the Company. 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.

5. MAKING A DISCLOSURE

The Company 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.

a) Internal Reporting

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

Role	Name	Contact Details
Chief Executive Officer	Craig Hutchison	P: 03 8825 6666 E: craig@sen.com.au
Chief Operating Officer and Company Secretary	Jodie Simm	P: 03 8825 6666 E: jodie@sen.com.au
Chief Financial Officer	Chris Tan	P: 03 8825 6666 E: chris.tan@sen.com.au
Human Resources Co-Ordinator	Andrew Ladias	P: 03 8825 6666 E: andrew.ladias@sen.com.au

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

- Officers;
- Directors;
- Senior Managers;
- Auditor or member of an audit team conducting an audit of the Company; Actuary.

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



b) External Reporting

It is recognised that in some circumstances you may not feel comfortable making an internal report, or where you have made an internal report, but no action has been taken within a reasonable time, you may disclose any Reportable Conduct to the Company's external independent whistleblower service, GPS Consulting using any of the following methods:

- Email to External Email: enquiries@gpsconsulting.com.au
- Phone: 0407 859 441

Details of the disclosure will, if appropriate, be forwarded to a Reporting Officer for further assessment, although the identity of the Employee making the disclosure will not be revealed by GPS Consulting where a request for anonymity has been made.

c) Anonymity

When making a disclosure, you may do so anonymously. It may be difficult for the Company to properly investigate the matters disclosed if a report is submitted anonymously and therefore the Company 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.

d) 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.

e) 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.

f) Public Interest and Emergency Disclosure

In certain situations, the conduct or wrongdoing may be of such gravity and urgency that disclosure to the media or a parliamentarian is necessary. A public interest and emergency disclosure can only be made to:

- A journalist, defined to mean a person who is working in a professional capacity as a journalist for a newspaper, magazine, or radio or television broadcasting service; or
- A Member of the Parliament of the Commonwealth or of a State or Territory parliament. You may only make a public interest and emergency disclosure if:
 - You have previously disclosed the information to ASIC or APRA;
 - At least 90 days has passed since the previous disclosure was made;
 - You have reasonable grounds to believe that action is not being taken to address the matters which you have disclosed;
 - You have reasonable grounds to believe that making a further disclosure to a journalist or member of parliament would be in the public interest;
 - You have given written notification, including sufficient information to identify the previous disclosure to the authority to which the previous disclosure was made that you intend on making a public interest disclosure; and



- ○ The extent of information disclosed is no greater than is necessary to inform the recipient of the misconduct or improper state of affairs.
- You will be qualified for protection where you have made a public interest disclosure if:
 - You have previously disclosed the information to ASIC or APRA;
 - You have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons, or to the natural environment; and
 - You have given written notification, including sufficient information to identify the previous disclosure to the authority to which the previous disclosure was made that you intend on making a public interest disclosure; and
 - No more information is disclosed than is reasonably necessary to inform the recipient of the substantial and imminent danger.

6. INVESTIGATION

The Company 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 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 the Company 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. Any report will remain the property of the Company and will not be shared with you or any person against whom the allegations have been made.

7. PROTECTION OF WHISTLEBLOWERS

The Company 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.

a) 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.



b) Protection against Detrimental Conduct

The Company (or any person engaged by the Company) 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 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.

The Company will take all reasonable steps to protect you from Detrimental Conduct and will take necessary action where such conduct is identified.

The Company 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.

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 participant in accordance with the reporting guidelines outlined above.

You may also seek remedies including compensation, civil penalties or reinstatement where you have been subject to any Detrimental Conduct.

c) Protection of Confidentiality

All information received from you will be treated confidentially and sensitively. If you make a disclosure under this policy, your identity (or any information which would likely to identify you) will only be shared if:

- You give your consent to share that information; or
- The disclosure is allowed or required by law (for example where the concern is raised with a lawyer for the purposes of obtaining legal advice);
- The concern is reported to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Australian Taxation Office (ATO) or the Australian Federal Police (AFP);
- Where it is necessary to disclose information for the effective investigation of the matter, and this is likely to lead to your identification, all reasonable steps will be taken to reduce the risk that you will be identified.



8. POLICY BREACH CONSEQUENCES

The following conduct will be a serious breach of this Policy:

- Deliberately making a false disclosure of Reportable Misconduct
- Breaching, confidentiality, by sharing Information about a disclosure to persons outside of the Investigation; and
- Subjecting or threatening to subject an Employee who has made a genuine report under this Policy to detrimental treatment.

All breaches will be subject to appropriate disciplinary action, up to and including termination of employment.

Some breaches may also constitute an offence under the law. In addition to the action that may be taken by the Group under this Policy, any Reportable Misconduct may be referred to a relevant law enforcement and/or regulatory bodies, if deemed to be warranted or if the law requires it.

An Employee making a genuine disclosure of Reportable Misconduct under this Policy will not be considered to have breached confidentiality provisions under their employment contract or agreement in relation to the information disclosed.

9. POLICY ADMINISTRATION AND COMPLIANCE

The Group will conduct periodic reviews of this Policy and may also conduct audits of the associated operating procedures to ensure disclosures of Reportable Misconduct are being appropriately recorded, investigated and responded to.

This policy will be made available on the Company website and in any other ways that will ensure that it is made available to persons to whom this policy applies. It will also be made available to officers and employees of the Company on the Intranet.

Release Date: December 2020

Review Date: December 2022