



Whistleblower Policy

Policy Date: 8 December 2025

Contents

Commitment	3
Purpose of this policy	3
Who is covered by this policy?.....	3
What is “Reportable Conduct”?.....	3
How do I raise a concern about possible Reportable Conduct?.....	4
How do I submit a report?	4
Can I make a report anonymously?	5
What happens after I make a report?	5
Will my report be treated confidentially?.....	5
Will I be protected if I submit a report?.....	5
Reporting.....	6
Implementation of this policy	6
Availability of this policy	6
Review of this policy.....	6
Amendment to this policy	6
Schedule	7

Commitment

Computershare is committed to the highest standards of ethical conduct in all of our business activities.

Purpose of this policy

The purpose of this policy is to support Computershare's commitment to the highest standards of ethical conduct and to provide everyone working at Computershare with the means to raise concerns, without the fear of retaliation, regarding Reportable Conduct.

Who is covered by this policy?

This policy applies to all businesses in the Computershare group globally. It is applicable to all current and former directors, officers, employees, associates and contractors (or any relative or dependent of these persons), as well as Computershare's suppliers and service providers and other persons who may be aware of Reportable Conduct concerning Computershare or any of its directors, officers, associates, employees or contractors.

What is “Reportable Conduct”?

Reportable Conduct can be actual or suspected and is anything that concerns misconduct or an improper state of affairs or circumstances in relation to Computershare, including that which is:

- Honest;
- Illegal or Fraudulent;
- Corrupt;
- A questionable practice relating to accounting or similar financial controls;
- A conflict of interest;
- An inappropriate offering or receiving of gifts or entertainment;
- Theft or embezzlement;
- A disclosure or misappropriation of confidential information;
- A danger to the environment or workplace health or safety;
- Harassment, discrimination or bullying;
- Violent or threatening;
- Indicative of a violation of local laws (including local taxation laws);
- Unethical or otherwise has the potential to damage Computershare's reputation;
- Any incident or event relating to undue influence, foreign interference, or malicious activity;
- An instance of modern slavery in Computershare's operations or supply chain;
- A violation of Computershare policy, such as Computershare's Code of Conduct; or
- Attempts to conceal any of the above

Reportable Conduct also includes any conduct which comprises retaliation against any person who raises concerns of Reportable Conduct under this policy or against anyone who helps address a concern raised.

How do I raise a concern about possible Reportable Conduct?

If you are an employee of Computershare and you become aware of any conduct which you consider or believe, on reasonable grounds or otherwise in good faith, may be Reportable Conduct, then you should initially raise it with a senior manager within your business division or function. In many cases, this should satisfactorily address your concern.

If you believe that you have been subject to harassment, discrimination or bullying, then you should first raise the issue in accordance with your local HR grievance procedures.

Computershare also recognises that there may be issues of such sensitivity that you do not feel comfortable raising with your senior manager or through your local HR processes or you may feel that a concern you have raised has not been adequately addressed. If that is the case, then you can submit a formal report of Reportable Conduct in accordance with the processes below.

How do I submit a report?

To submit a formal report of Reportable Conduct, you can:

- Report the matter through our external [Global Whistleblower Hotline / Website](#), as provided by an independent third-party operator, EthicsPoint. This service has been established to facilitate anonymous and confidential reporting and is accessible 24 hours a day, 7 days a week across all regions in which Computershare operates. Reports can be made online or over the phone. All reports submitted through the service will be forwarded by EthicsPoint to Computershare for assessment and, if they relate to Reportable Conduct, will be investigated under this policy. You can access the Ethicspoint Hotline / Website at <http://computershare.ethicspoint.com>; or
- Report the matter to your Regional Whistleblower Officer by phone or email. The Regional Whistleblower Officers are:

Region & Contact	Email	Phone
Australia, New Zealand, Hong Kong and China Mark D'Arcangelo	mark.d'arcangelo@computershare.com.au	+61 3 9415 5194
UK, Channel Islands, Continental Europe (excl. Switzerland, Norway and Poland), Ireland and South Africa Bill Becker (Acting)	bill.becker@computershare.com	+1 502 301 6099
United States, Canada and India Bill Becker	bill.becker@computershare.com	+1 502 301 6099
Switzerland, Norway and Poland Basak Koeklue	basak.koeklue@equatex.com	+41444036346

Can I make a report anonymously?

If you make a report, you may choose to remain anonymous and there is no requirement that you provide your name in order to qualify for protection under this policy.

What happens after I make a report?

If you raise a report under this policy, then it will be assessed to determine if it relates to Reportable Conduct and, if so, will be investigated as appropriate. The investigation process includes:

Assigning an investigation team - Experts with the right knowledge and objectivity are assigned to investigate.

Conducting an investigation - The team determines the facts through interviews and/or review of documents as necessary. Unless there are confidentiality or other reasons not to do so, persons to whom the disclosure relates will be informed of the allegation at an appropriate time, and will be given a chance to respond to the allegations made against them.

Corrective action - If necessary, the team recommends corrective actions to the appropriate managers for implementation.

Feedback - The person raising the concern receives feedback on the outcome, to the extent he or she has made available a means to contact him/her.

If you are an external party and your report is assessed as relating to a concern or complaint about a product or service provided by Computershare rather than to Reportable Conduct, then the report will be referred to your local service concern department for further investigation and resolution.

Will my report be treated confidentially?

If you raise a report under this policy then the information you provide will be shared only on a strict “need-to-know” basis as necessary for investigating the concern raised. In any case, all reasonable steps will be taken to protect your identity where your report is made on reasonable grounds, or otherwise in good faith. We will not disclose your identity without your consent, except as permitted or compelled by legal and regulatory requirements in your local jurisdiction.

All files and records created from an investigation will be retained under strict security.

Will I be protected if I submit a report?

Computershare will not tolerate any retaliation against any person who raises (or attempts to raise) a report of Reportable Conduct on reasonable grounds, or otherwise in good faith, or a person who helps to address or investigate a concern raised. Retaliation occurs where a person causes or threatens detriment to another person, which may include (but is not limited to):

- Disadvantage or discrimination in employment (e.g. demoting, dismissing or suspending a person);
- Harassment or intimidation;
- Harm or injury (physical or psychological harm);
- Any damage to a person, including their property, reputation or financial position; or

- Any of the above actions when carried out against any person associated with the whistleblower.

Any such retaliatory action is grounds for disciplinary action up to and including dismissal. In some cases, retaliatory action may attract civil or criminal liability.

Reporting

The Group General Counsel will report on whistleblower incidents quarterly to the Global Risk and Audit Committee. These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this policy.

In addition, serious and/or material Reportable Conduct will be considered by the Group General Counsel for immediate referral to the Chairman of the Global Risk and Audit Committee.

Implementation of this policy

This policy must be implemented in accordance with the local laws of the relevant jurisdiction in relation to which a disclosure is made. To the extent of any inconsistency between local jurisdictional requirements and the requirements of this policy, the local jurisdictional requirements will prevail.

In certain jurisdictions where Computershare operates, it is necessary for this policy to be supplemented by an addendum which sets out specific requirements for that jurisdiction. Information relating to these addenda as well as access to translations of this policy is set out in the Schedule.

Availability of this policy

This policy is available on the Whistleblower webpage of Computershare's website and on Computershare's intranet site.

Review of this policy

The Group General Counsel and the Global Risk and Audit Committee will monitor and annually review the effectiveness of this policy.

Amendment to this policy

This Policy can only be amended with the approval of the Global Risk and Audit Committee of Computershare Limited.

This version of the Policy was approved by the Global Risk and Audit Committee on 8 December 2025.

Schedule

Set out below is a list of and access to Addenda to this Global Whistleblower policy to meet the requirements of a specific jurisdiction as well as a list of and access to available policy translations.

Country	Addendum	Global Policy Translation
Australia	Australian Addendum (English)	
Canada		Whistleblower Policy (Canadian French)
China / Hong Kong		Whistleblower Policy (Simplified Chinese)
		Whistleblower Policy (Traditional Chinese)
Denmark	Denmark Addendum (English)	
France	France Addendum (English)	
	France Addendum (French)	
Germany	Germany Addendum (English)	Whistleblower Policy (German)
	Germany Addendum (German)	
Ireland	Ireland Addendum (English)	
Italy	Italy Addendum (English)	Whistleblower Policy (Italian)
	Italy Addendum (Italian)	
Netherlands	Netherlands Addendum (English)	
Poland	Poland Addendum (English)	
Spain	Spain Addendum (English)	Whistleblower Policy (Spanish)
	Spain Addendum (Spanish)	
Sweden	Sweden Addendum (English)	
United Kingdom	United Kingdom Addendum (English)	