

Global Whistleblowing Policy

This policy details the requirements surrounding the rights of staff and third parties to disclose improper conduct confidentially, anonymously, in good faith and on reasonable grounds without the fear of reprisal or detrimental action.

***“DT Global values Integrity and Collaboration in everything we do.”
- DT Global Values Statement***

1. Background

DT Global is committed to the highest standard of conduct and ethical behaviour in all activities, and to promoting a culture of corporate compliance, honest and ethical behaviour.

We champion a ‘Speak Up’ culture where all staff and those involved with DT Global feel confident, encouraged and safe raising any issues relating to actual, possible, or suspected wrongdoing, breach of law, best practices or our policies and procedures.

2. Purpose and scope

Purpose

All staff are encouraged to promptly make reports of misconduct as such reports help to identify and deter wrongdoing, in line with DT Global's risk management and governance framework, as well as to support DT Global's long-term sustainability and reputation.

Scope

This policy outlines DT Global's minimum global commitments governing whistleblowing. However, regional, national or local laws or regulations may provide stronger protections. This policy should be read alongside our regional policies and processes, as well as local laws for a full picture of whistleblowing rights, responsibilities and processes.

3. What is “Speak Up Culture”?

‘Speak Up Culture’ is DT Global's commitment to creating an environment where all staff and those involved with DT Global feel confident, encouraged and safe to proactively raise concerns. A Speak Up Culture helps us to address issues early by setting a tone of transparency and clear expectations around the highest standards of behaviour, both legal and ethical.

4. Does this Policy apply to me?

Anyone can report misconduct relating to DT Global under this policy. Not all parts of this policy will apply to every circumstance.

This includes:

- members of the public,
- current or former employees,
- spouses, relatives or dependants of one of the people referred to in this list,
- sub-contractors, suppliers, consultants, and advisers,
- grantees, and
- clients.

5. What to Report

You should report any conduct or activity which you reasonably believe poses a significant risk to our employees, the community, our property, our operations or our reputation ('misconduct').

You are encouraged to promptly make reports of misconduct, including:

- Theft
- Fraud
- Dishonesty
- Harassment, bullying or discrimination
- Unethical Behaviour
- Workplace safety hazards
- Money laundering
- Offering or accepting a bribe
- Non-compliance or suspected non-compliance with legislation, regulations or policy
- Engaging in detrimental conduct against a person who has made a report
- Any deliberate concealment relating to the above.
- A breach of the Code of Conduct
- A breach of DT Global's approval practices and guidelines
- Unethical conduct
- Financial malpractice or impropriety
- Conduct which represents a danger to the public or financial system
- Labour exploitation or modern slavery within DT Global or within DT Global's supply chain
- Auditing non-disclosure or manipulation of any audit processes

6. How to Report

DT Global provides access to an independent, externally managed DT Global Ethics Hotline to report misconduct.

The DT Global Ethics Hotline service is provided by Core Integrity and can be contacted 24/7. Individuals will have the option to make reports anonymously. If you do want to remain anonymous please report directly to the DT Global Ethics Hotline. Please do not cc any of the other email addresses.

The DT Global Ethics Hotline reporting options are set out below:

Reporting Channels

Reports under this policy can be made to:

- **DT Global Ethics Hotline**
 - **Online:** grs.ly/DTGlobalEthicsHotline
 - **Australia:** 1800 765 692
 - **USA:** 1 (800) 203-7008
 - **Spain:** 900 998 400
 - **Any Other Country:** +61 2 9053 9285

- **Email:**
speakup@coreintegrity.com.au
- **Mail (postal address):** PO Box
730 Milsons Point NSW Australia
1565
- **Your manager**, supervisor, contract point of contact, or senior management
- **A member of the DT Global Legal Team** at ld.legal@dt-global.com
- **A member of the DT Global APAC Safeguards Team** at safeguards@dt-global.com
- **A member of the DT Global UK Safeguards Team** at safeguardingteamUK@dt-global.com

In some jurisdictions, whistleblower reports must be made to specific authorised individuals to benefit from statutory whistleblower protections. The reporting channels listed above are authorised by DT Global to receive whistleblower disclosures. If you are unsure whether legislative whistleblower protections may apply to you, we encourage you to seek independent legal advice.

In some jurisdictions, you may be entitled to make a public disclosure. However, to benefit from legal protections, certain criteria may need to be met before you make such a disclosure. You should seek independent legal advice if you are considering making a disclosure of this nature.

7. Rights and Responsibilities

General

Reprisal against any staff member who makes a report of misconduct, the **'Whistleblower'**, is strictly prohibited.

DT Global does not tolerate acts of retaliation against anyone who makes a report of misconduct or who participates in an investigation of possible wrongdoing. Some examples of reprisal and retaliation include

- dismissal;
- injury of an employee in their employment;
- alteration of an employee's position or duties to their disadvantage;
- discrimination between an employee and other employees of the same employer;
- harassment or intimidation of a person;
- harm or injury to a person, including psychological harm;
- damage to a person's property, reputation, business or financial position; or
- any other damage to a person.

Protections

Whistleblowers will be entitled to the protections outlined below regardless of whether or not the report actually uncovers misconduct, as long as you have reasonable grounds to suspect that the information you are disclosing concerns misconduct.

Employees who make a good faith report will not be disadvantaged in their employment by DT Global.

Specific protections available to persons who report misconduct include the following:

- **Personal safety assessment**
 - DT Global will work with the Whistleblower to put in place reasonable measures to mitigate any risks to a Whistleblower's personal safety.
- **Confidentiality / identity protection** when it is practical and appropriate in the circumstances

- The authorised recipient of the disclosure, a member of the DT Global Legal team (or if appointed, external investigators) will take all reasonable steps to protect the identity of Whistleblowers, including by keeping information that is likely to lead to the identification of Whistleblowers confidential (unless the Whistleblower consents to the disclosure of identifying information). However, DT Global may be entitled to report the information to local law enforcement authorities or legal advisers (to obtain advice).
- **Anonymity**, if desired
 - When making a report, the reporter can also choose to remain anonymous over the course of the investigation and after the investigation is finalised.
 - Staff may also refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. If you wish to make a report and remain anonymous, DT Global recommends using the DT Global Ethics Hotline and selecting the option to receive notifications of updates and communications, as this will enable ongoing two-way communication and assist with follow-up questions and feedback. The DT Global hotline enables Whistleblowers to remain entirely anonymous, and DT Global will not be provided with access to the contact information you provide on the platform even if you agree to be notified of updates or further communications via the platform.
 - Although you are entitled to make disclosures anonymously, and we encourage you to do so if you are not comfortable to "Speak Up" without anonymity, it is important to be aware that in some instances anonymous disclosures may not be dealt with as quickly - or potentially even as effectively – as direct reports to an authorized recipient due to the challenges it can bring in investigating the conduct. DT Global may be limited in its ability to request further information, provide updates on the status of the investigation and/or ensure that any investigation is conducted fairly and in accordance with the principles of natural justice.
 - All Whistleblowers who disclose their identity while making a disclosure will be afforded confidentiality protections in respect to their identity as outlined above.
- **Protection from victimisation, reprisal or retaliation**
 - DT Global does not tolerate reprisal or retaliation against Whistleblowers. This behaviour is prohibited under DT Global's policies, in addition to the requirements of local policies and legislation.
 - DT Global will terminate staff who knowingly engage in direct or indirect reprisals against a Whistleblower.
 - DT Global will report retaliations against Whistleblowers which constitute an offence to law enforcement and support efforts for prosecution of that offence.
- **Protection from legal action**
 - Eligible Whistleblowers who make a protected disclosure are protected from certain legal action taken by DT Global or any individuals for making the disclosure, including:
 - civil, criminal, and administrative (including disciplinary) action against the Whistleblower; and
 - contractual action, including termination of a contract on the basis that making a disclosure is a breach of that contract.
 - However, these protections do not grant immunity for any misconduct that a Whistleblower has engaged in and which is revealed in their disclosure.
- **Access to Employee Assistance Programs** including counselling.
- **Compensation** (in certain circumstances)
 - Whistleblowers may be entitled to seek compensation or other remedies through the court system. If you believe this may be relevant to you, you should seek independent legal advice in relation to these circumstances.

Local Contexts

Many countries have enacted legislation to protect Whistleblowers. DT Global is committed to giving effect to any applicable protections afforded by such laws. Further, specific whistleblower protections contained in legislation may be available to staff depending on the facts of the report and staff location.

If Whistleblowers have any concerns or queries about the availability of whistleblower protections, it is recommended they seek independent legal advice on what whistleblower protections may apply to their circumstances outside this Policy.

Training

DT Global provides training on the Whistleblowing policy as part of its compliance training. Specific training is available for senior managers and other employees authorised to receive whistleblowing reports.

Responsibilities

The Chief Operating Officer and DT Global Legal team are responsible for the administration of this policy including:

- Receiving all disclosures from staff, management or the independent whistleblower service (subject to compliance with requests for anonymity) and acknowledging receipt with the Whistleblower (if possible, depending on any anonymity requirements).
- Appropriately investigating all disclosures ensuring the principles of natural justice are applied to the respondent(s) of any disclosure and investigation.
- Reporting all disclosures to the CEO (except where necessitated and adhering to confidentiality requirements if applicable).
- Providing annual consolidated reports to the CEO (except where necessitated and adhering to confidentiality requirements if applicable).

8. What Happens When You Report

The DT Global Ethics Hotline enables you to:

- make your report, confidentially;
- receive updates on the status of the report; and
- provide additional information to the DT Global while remaining anonymous if you choose.

Whether or not you choose to report anonymously, your report will be treated confidentially.

Whether you report via the DT Global Ethics Hotline or using our internal process, the DT Global Legal team (or if appointed, external investigators) will acknowledge receipt of the report within 7 days of receipt of the communication and will contact you during key stages of an investigation such as when the investigation process has begun; while the investigation is in progress; and after the investigation has been finalized. If you make an anonymous report, you can agree to receive notifications of updates or further communications from DT Global. If you do not select this option, you will only be able to see updates or further information if you log into the portal regularly to check.

Investigation Framework

All reports received will be assessed and may be subject to an investigation. The objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported. Any ensuing investigation will be objective, fair and independent and will preserve confidentiality.

To the extent it is practical, investigations will be independent of the Whistleblower, any individuals who are the subject of the report and the department or business unit involved. If considered necessary, DT Global may appoint external investigators.

All staff are expected to cooperate in the investigations of reports.

Following an assessment or investigation, DT Global will determine the appropriate corrective actions, such as process improvements, accountability or discipline measures¹.

Any staff member who is the subject of a report will be advised about the subject matter of the report as and when required by principles of procedural fairness/natural justice and prior to any adverse findings being made. DT Global will determine the most appropriate time to inform the staff member.

Any staff member who is the subject of a report may contact the DT Global Employee Assistance Provider for support services such as counselling.

If compliance with DT Global's confidentiality obligations will prevent it from conducting a fair investigation, DT Global will discuss this with the Whistleblower (if possible) before progressing the matter and otherwise, may be unable to finalise the investigation.

¹ Spanish Law mandates a maximum period for the investigation to be completed of three (3) months. This time limit may be extended to a further three (3) months in complex cases.

Whistleblowing FAQ

Why should I blow the whistle on misconduct?

To help make DT Global a fair, safe and honest place to work, and to protect the communities we work with. Misconduct can have a negative effect on our projects, the work environment, and DT Global's reputation. By reporting misconduct you can help ensure our team and our communities are safe and secure, and help save money by detecting fraud, that can be better invested in our people and program outcomes.

What if I suspect something is wrong, but I'm not sure?

Most cases reported are uncovered through tips from honest people who are not sure of their facts. That is perfectly all right. It is not expected you will know every last detail. Reporting what you do know is enough.

Whistleblowers will be entitled to the protections outlined in the Whistleblowing Policy regardless of whether or not the report actually uncovers misconduct, as long as you have reasonable grounds to suspect that the information you are disclosing concerns misconduct.

Can I be anonymous?

Yes, refer to the protections outlined in the Whistleblowing Policy. However, when you report anonymously it can be more difficult for DT Global to take action. Consider reporting through the Ethics Hotline, which is purposely designed to protect your identity, but allows DT Global to provide updates or request additional information..

What types of matters do not qualify for protection under the Whistleblowing Policy?

Reports which relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the person making the report, should be raised and discussed with your Human Resources representative, your Manager or by following any applicable Complaints and Grievance procedure. These types of grievances will not typically qualify as whistleblower disclosures and you will not be entitled to the whistleblower protections outlined in the Whistleblowing Policy.

Specific examples of grievances that may be personal work-related grievances (and are not covered by the Whistleblowing Policy) include:

- an interpersonal conflict between the report maker and another employee;
- a decision that does not involve a breach of workplace laws;
- a decision about the engagement, transfer or promotion of the report maker;
- a decision about the terms and conditions of employment / engagement of the report maker; or
- a decision to suspend or terminate the employment / engagement of the report maker, or otherwise to discipline the report maker for reasons entirely unrelated to the making of a report or disclosure.

However, the following types of personal work-related grievances may be covered by the Whistleblowing Policy:

- (a) reports which include information about misconduct, or information about misconduct which is accompanied by a personal work-related grievance (mixed report); or
- (b) situations where the report maker suffers from or is threatened with detriment for making a report.

Finally, making a report which you know is not true or deliberately making a false report is a violation of DT Global's Code of Conduct and will be treated accordingly. If you deliberately make a false report, the protections described in the Whistleblowing Policy and local laws and regulations may not apply to you.

What is not covered by the term 'reprisals'?

Reprisal does not include administrative action that is reasonable to take for the purpose of protecting a Whistleblower from detriment (e.g. moving a Whistleblower who has made a report about their immediate work area to another office to prevent them from detriment) or managing unsatisfactory work performance, provided the action is in line with the relevant DT Global performance management framework.

9. Policy Control and Change History

The effectiveness of this Policy is to be monitored and reviewed by the Chief Operating Officer at least every three (3) years.

Version Control	Effective Date	Approved by	Amendment
V 1.0	01 July 2025	Gerome Rich, COO	First Version