

Report and Investigation Officer: Hilary Macdonald, General Counsel & Company Secretary, (appointed 23 February 2018).

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1. BACKGROUND

Directors, officers, employees and contractors are expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities as set out in the Company's Code of Conduct and the STARR Core Values. All employees and representatives of the Company must practise honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The aim of this Policy is to ensure that Directors, officers, employees and contractors comply with these obligations. It also encourages reporting of violations (or suspected violations) and provides effective protection from victimisation and retaliation or dismissal to those reporting by implementing systems for confidentiality and report handling. Anyone working for or engaged by Northern Star receives training in the form of a Company wide or site-specific induction which covers the Whistleblower Policy, and are expected to understand and comply with it.

This policy is authorised by the Board of Directors of the Company and cannot be amended without the prior approval of the Board of Directors. The Board of Directors and the Chief Executive Officer encourage employees to come forward with complaints of breach of the Code of Conduct which they experience or observe, which they regard as serious, and warrant investigation by the Report and Investigation Officer for reporting to the Board.

2. REPORTING RESPONSIBILITY

It is the responsibility of all Directors, officers, employees and contractors to comply with the Company's Code of Conduct and report violations or suspected violations in accordance with this Policy.

The Company's Equal Employment Opportunity Policy also provides an alternative pathway for reporting and investigating unlawful discrimination, victimisation, harassment and retaliation on the basis of sex, colour, religion, national origin, disability, age, and any other class protected by law.

3. NO RETALIATION

No current or former Director, officer, employee or contractor, or family member of any of those persons, who reports a violation under this Policy on objectively reasonable grounds to suspect such violation has occurred, shall suffer detriment, either actual or threatened, harassment, retaliation or adverse employment or engagement consequence. If a Director, officer, employee or contractor, retaliates against someone who has reported a violation on objectively reasonable grounds of suspicion they will be subject to discipline up to and including termination of employment or services.

4. REPORTING VIOLATIONS

This Policy is intended to encourage and enable employees and others to raise concerns which they regard as serious, within the Company.

In most cases, employees should approach their supervisor first as they may be in the best position to address a concern. If employees are not comfortable speaking to their supervisor or not satisfied with their supervisor's response, they are encouraged to speak with anyone in management whom they are comfortable in approaching.

Supervisors, managers and Human Resources are required to report suspected violations of the Company's Code of Conduct to the Report and Investigation Officer, who has specific and exclusive responsibility to investigate all reported violations.

5. REPORT AND INVESTIGATION OFFICER

The Report and Investigation Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Company's Code of Conduct. At their discretion, the Report and Investigation Officer shall advise the Executive Chair and the Chief Executive Officer and/or the Chair of the Audit and Risk Committee. The Report and Investigation Officer must inform the Board and/or the Audit and Risk Committee of any serious breaches of the Code of Conduct which are reported under this Whistleblower Policy.

The Report and Investigation Officer has direct access to the Audit and Risk Committee and is required to report to the Audit and Risk Committee at least annually on compliance activity.

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If any person is not comfortable speaking with the Report and Investigation Officer on a particular matter or if they are unavailable and the matter is urgent, they should contact the Executive Chair or another member of the Board via the Company's switchboard on +61 8 6188 2100.

6. ACCOUNTING AND AUDITING MATTERS

The Audit Committee will address concerns raised in relation to corporate accounting practices, internal controls or auditing. The Report and Investigation Officer is responsible for notifying the Audit Committee of any such complaint and working with the Audit and Risk Committee to resolve the matter.

7. REASONABLE GROUNDS

Any person filing a complaint concerning a violation or suspected violation of the Company's Code of Conduct must have objectively reasonable grounds for suspecting the information disclosed indicates a violation of the Company's Code of Conduct. It is a serious disciplinary offence to make allegations that prove to be unsubstantiated and made maliciously or known to be false.

8. CONFIDENTIALITY AND ANONYMITY

Reports of violations or suspected violations will be kept confidential and the identity of the reporting person may only be disclosed to ASIC, APRA, a member of the Australian Federal Police or to someone else with the consent of the discloser, consistent with the need to conduct an adequate investigation.

If a person reporting a violation does not consent to their identity being disclosed the company will:

- (a) take reasonable steps to protect the whistleblower's identity, such as removing their name, position title, team or Department, and any other identifying details from any disclosure; and
- (b) ensure any investigation does not comment on or attribute the source of the report.

If the person reporting a violation does so anonymously, the Company will preserve that person's anonymity and the Report and Investigation Officer will not disclose their identity except with the whistleblower's consent.

9. HANDLING OF REPORTED VIOLATIONS

The Report and Investigation Officer will notify the person who reported the alleged violation and acknowledge receipt of the report within five (5) business days. All reports will be promptly investigated and, if warranted, appropriate corrective action will be taken. In conducting investigations, the Report and Investigation Officer must ensure that they and any staff assisting in the investigation or who may become aware of the report or investigation comply with this policy, including observing the confidentiality obligations and in particular not disclosing the information reported, the identity of the person making the disclosure or any information that is likely to lead to the identification of the person making the disclosure.

If the report warrants the Company taking any actions to address an employee issue with a whistleblower (such as a work-related grievance or unsatisfactory performance issue), provided such actions are not because of the whistleblower disclosure (either wholly or in part), that process may be undertaken at the same time as investigation of the whistleblower's report, but will be handled by different Company personnel and separately documented.

The person who reported the violation will have the option to receive a summary of the investigative steps taken by the Report and Investigation Officer and the outcome of the investigation.

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