

A young man with dark hair, smiling broadly, wearing a dark blue t-shirt and a black backpack. He is holding a red folder or book. The background is a blurred outdoor setting with green foliage and a grey structure.

SPEAK UP POLICY

January 2022

Foreword

This policy is about encouraging our people to speak up whenever they have a concern about breaches of INTO University Partnership (IUP) policies and standards, any wrongdoing or the risk of harm to our people, students, partners, the public, the environment or IUP in a culture of openness and accountability.

This communication and the information in it are confidential and for internal use only, and may not be distributed externally. Misuse of this communication and any of the information contained may subject an employee to disciplinary action including termination of employment

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Purpose

Consistently achieving high standards in the way we run our business helps us achieve the right outcomes for IUP, our students, our partners and our people. IUP is committed to conducting its business responsibly and with honesty and integrity. However, all businesses face the risk of something going wrong or people behaving in ways which are not appropriate or acceptable. That's why a culture of openness and accountability is so important and why it's important to have a framework in place to enable our people to report issues and concerns if they are not able to raise those concerns with their manager or they believe that their concerns have not been dealt with appropriately.

The purpose of this policy therefore is to ensure there is such a framework for people working at IUP to raise genuine concerns (and anonymously if necessary) about breaches of IUP policies or standards, any wrongdoing or the risk of harm to our people, customers, the public, the environment or IUP in such circumstances safe in the knowledge that the matter will be taken seriously, appropriate action will be taken and that they will not suffer any negative consequences.

Why is this Policy important?

This Policy assists in the promotion of a culture of openness and accountability across IUP and supports the management of people, legal, regulatory and reputational risks. It provides a framework for genuine concerns to be investigated and responded to effectively and for any lessons to be learnt in circumstances where the matter might otherwise go unreported or not be actioned appropriately.

What if we don't comply?

IUP may not be aware of an unsafe practice, risk or wrongdoing which has the potential to cause harm to people, students, partners, the public, the environment or IUP. Failure to comply may also expose IUP and individuals to legal or regulatory sanctions.

Scope

This Policy is applicable to all IUP owned and controlled businesses.

The Policy applies to our people. This means to all people working at all levels of IUP including senior managers, officers, directors, employees, consultants, contractors, trainees, home workers, part time and fixed term workers, work experience, students, casual and agency staff.

It applies to any breach of IUP policies and standards or wrongdoing or any risk of harm to staff, students, partners, the public, the environment or IUP. For example, this may include:

- Breaches of health and safety;
- Bribes or kickbacks;
- Breaches of data privacy;
- Breaches of professional practice requirements;
- Risk of damage to reputation;
- Harassment and/or bullying

Although not covered by the Policy, any other individual or organisation such as a supplier or family member are encouraged to report concerns regarding IUP or anyone acting on IUP's behalf. Such openness can help matters of concern reach us which may otherwise not do so.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure, Complaint Reporting Procedure or other procedure as appropriate.

This Policy does not form part of any employee's contract of employment and may be amended at any time.

Key Principles for all our people

Speak Up: You should ideally raise any concerns you have with your line manager or a senior manager in your business unit. However, if you have a genuine concern that there has been a breach or potential breach of IUP policies or standards or wrongdoing or any risk of harm to staff, students, partners, the public, the environment or IUP and you feel that a manager has not addressed your concern or you do not feel able to raise it with them, then you should Speak Up.

Follow the Speak Up process: You can report your concern to the HR representative for your area. If you do not feel able to raise it with them or you do not feel that they have acted appropriately, you can raise the matter with:

Kirsty O'Donnell, VP Commercial Finance (Corporate & Risk) (kirsty.odonnell@intoglobal.com)

Emma Samarasinghe, EVP, People (emma.samarasinghe@intoglobal.com)

Jon Holmes, Chief Financial Officer (jon.holmes@intoglobal.com)

You can also report a concern online or by phone via our EthicsPoint site www.intoglobal.ethicspoint.com

Issues will be handled confidentially wherever possible. If there are circumstances under which we need to share the information you have given us with others, we will discuss it with you in advance provided that you have given us your contact details. We hope you will feel able to speak up openly under this Policy, as doing so helps ensure we can investigate and respond to your concerns appropriately, but you will be able to raise issues anonymously if you would prefer.

Act appropriately. You must not victimise anyone who Speaks Up or discourage them from Speaking Up.

Our Principles

Promoting Speak Up

We want to know about any breach or potential breach of our policies and standards, or any wrongdoing or risk of harm, to our people, students, partners, the public, the environment or IUP, that may be occurring despite our rigorous compliance procedures. We take all appropriate steps to ensure that our people feel able to report genuine concerns to us about such matters without fear of negative consequences and that they also see it as their duty to do so.

Reporting Speak Up concerns

All our people are informed of how to report concerns to us and can report them confidentially and anonymously. In certain circumstances, we may be required to disclose information and identities of individuals by law or for the purpose of legal proceedings or government investigations or in order to carry out an investigation or to implement any recommendations following an investigation, or to take appropriate action to protect individuals from harm or for audit and compliance purposes or in accordance with the rules of relevant professional bodies.

In some circumstances (depending on the nature of the concern raised), we may decide that the investigation of a concern and any attempt to resolve it should take place via another relevant procedure (for example a local grievance procedure), for example where a concern relates to an employee's individual circumstances.

Responding to Speak Up concerns

We will:

- investigate all such concerns that are reported to us;
- provide appropriate progress updates and feedback to the individual who has raised the concern;
- track the progress of each case, and ensure that any recommendations/actions resulting from an investigation are implemented, including disciplinary action when required to ensure that issues are appropriately addressed and any lessons learnt;
- where appropriate, report actual or suspected breaches of law to the relevant law enforcement agencies;
- carry out a review in cases where the individual raising the concern is dissatisfied with the way in which it has been handled; and
- do not allow decisions concerning speaking up within IUP to be influenced by race, sex, pregnancy or potential pregnancy, colour, sexual orientation, gender identity/expression/history, transgender or transsexual status, political belief or activity, religion, marital status, caring responsibilities, parental status, breastfeeding, irrelevant criminal or medical record, national or ethnic origin, disability, age, citizenship or membership of a representative body except where required or justified by any applicable laws.

If we conclude that an individual has made false allegations maliciously they may be subject to disciplinary action up to and including summary dismissal. In those circumstances, we may also inform the person against whom the allegations have been made.

Protection & Support

We take all appropriate steps to ensure that our people who report genuine concerns receive independent advice and support and are protected from negative consequences. We will not tolerate harassment or retaliation of any kind against anyone who seeks advice or raises a genuine concern covered by this Policy. Anyone who subjects a colleague to such treatment will face serious consequences which may include disciplinary action up to and including dismissal.

Legal and regulatory compliance

We comply with all applicable laws and regulations relating to whistle blowing.

Record Keeping

Appropriate records of concerns raised under this Policy and of investigations including their conclusions and any action taken are retained securely and confidentially.

Monitoring & Review

We take appropriate steps to ensure that this Policy is complied with and that it operates effectively and consistently across IUP.

In particular, a **Speak Up Oversight Group**:

- Monitors the effectiveness of the Speak Up Policy
- Oversees material investigations into matters reported under this Policy
- Provides advice on remedial actions
- Shares lessons learned across IUP
- Is chaired by the EVP, People and includes members of the Executive Board
- Reports to the IUP Board on Speak Up at least once a year

IUP's compliance with this Policy is monitored by the Chief Financial Officer (CFO) who reports the level of compliance to the Audit Committee at least twice a year.