Speak Up Policy

1 What is the purpose of this Policy?

At Super Retail Group Limited (**Company**), one of our core values is 'We speak up'. Speaking up is an important part of our culture, embedded in our values, and we are committed to creating and maintaining a safe to Speak Up culture.

The Company and its wholly owned subsidiary companies (**Group**) are committed to conducting business honestly, with integrity, and in accordance with its values and standards of expected behaviour.

The Board of Directors of the Company has approved this Policy to operate for the Group in order to:

- encourage people to Speak Up if they become aware of Potential Misconduct;
- help deter wrongdoing, in line with the Group's risk management and governance framework;
- explain how to Speak Up and what protections a Discloser will receive;
- support the Group's values and Code of Conduct;
- outline the Group's processes for responding to Speak Up reports; and
- promote a workplace environment in which everyone feels safe, supported and encouraged to Speak Up.

A failure to Speak Up exposes the Group to additional risks and will undermine our culture and values.

The Board will not tolerate anyone being discouraged from Speaking Up or being subject to detriment because they want to Speak Up or they have done so. Disciplinary action, up to and including termination of employment or engagement, may be imposed on anyone shown to have disadvantaged, victimised or otherwise caused detriment to a person because they want to, or have, spoken up.

While the Company encourages all team members to Speak Up about a range of matters, the scope of this Policy is limited to protected Disclosures.

2 What is Speaking Up?

Speaking Up means telling an appropriate person in a position of influence (examples of these people, called **Recipients**, are provided in section 5 below) if you have reasonable grounds to suspect that Potential Misconduct has occurred or is occurring in relation to the Group, this is called a **Disclosure**.

If you are an eligible whistleblower, called a **Discloser**, and you report Potential Misconduct to an eligible recipient you will qualify for legal protections. Further information is in Attachment 1.

In addition to the protections granted under this Speak Up Policy, team members or eligible whistleblowers from New Zealand and China may qualify for further protections. The provisions outlined in Attachment 2, specific to New Zealand and China, may alter the terms and functionality of this Speak Up Policy to accommodate local laws and regulations, and must be reviewed alongside this Speak Up Policy. To the extent of any inconsistency between this Speak Up Policy and the provisions specific to New Zealand and China, the New Zealand or Chinese provisions will prevail.

Anyone with information about Potential Misconduct is encouraged to report that information to a Recipient (i.e. to Speak Up). If in doubt, Speak Up.

3 What is Potential Misconduct?

Potential Misconduct is any suspected or actual misconduct or improper state of affairs or circumstances in relation to the Group. This will include conduct in relation to an employee or officer of the Group.

Potential misconduct also means a breach of law or information that indicates a danger to the public or to the financial system.

You should Speak Up even if you are unsure if something is Potential Misconduct.

Potential Misconduct does **not** generally include **personal work-related grievances**.

Personal work-related grievances are grievances about something in relation to your current or former employment or engagement that have implications for you personally (such as a disagreement between you and another employee or a decision about your promotion).

Generally, these grievances should be raised via the Workplace Resolution Policy to allow those issues to be resolved most effectively.

Examples of Potential Misconduct include, but are not limited to:

- breach of laws or regulations;
- criminal activity;
- conduct endangering health and safety, or causing damage to the environment;
- dishonest, unethical, or corrupt behaviour, including soliciting, accepting or offering a bribe, facilitation payments or other such benefits;
- conflicts of interest;
- unauthorised use of the Group's confidential information;
- information that indicates a danger to the public or to the financial system;
- anti-competitive behaviour;
- financial fraud or mismanagement;
- insider trading;
- breach of trade sanctions or other trade controls;
- modern slavery practices;
- tax-related misconduct;
- conduct likely to damage the Group's financial position or reputation; and
- deliberate concealment of the above.

While personal grievances will not generally amount to Potential Misconduct, they may be covered by this Policy in certain situations.

For example, a grievance may be covered by this Policy if it:

- relates to detriment that has been suffered or is threatened because an individual has raised a concern about suspected Potential Misconduct;
- relates to both a personal work-related grievance and Potential Misconduct; or
- relates to concerns that the Group has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or information that suggests misconduct beyond the Discloser's personal circumstances.

In some cases, personal work-related grievances may qualify for legal protection. See Attachment 1 for details.

4 Who can Speak Up?

Anyone with information about Potential Misconduct is encouraged to Speak Up.

This Policy applies to:

- the Group; and
- all of the Group's current and past employees, volunteers, officers, contractors, consultants, suppliers (including employees of suppliers), work experience participants, students on placements, and associates, as well as these people's dependants (or their spouse's dependants) and their relatives.

Please see Attachment 1 for information about protections that may be available to Disclosers under whistleblowing laws in Australia.

5 Who should I tell?

The Company encourages you to Speak Up to one of the following **Recipients** listed in the table below.

To assist you to Speak Up, the Company has established an Integrity Line. The Integrity Line is an external online reporting service that gives you the opportunity to anonymously report Potential Misconduct in a secure manner. The Integrity Line also allows for two-way anonymous communication between you and the Group, and gives you control on the disclosure of your identity. You can contact the Integrity Line via the details set out below.

Recipient Name	Contact Details
Integrity Line	You can contact the Integrity Line as follows: • for matters arising in Australia or New Zealand, by accessing the Whispli platform by visiting https://superretailgroup.whispli.com/IntegrityLine or scanning the QR code below; or • for matters arising in China, calling +86 21 22206297.
Integrity Officers: • Chief Legal Officer • Chief People and Safety Officer	You can contact the Integrity Officers by post to: The Integrity Officer (Confidential): PO Box 344, Strathpine, Queensland, Australia 4500
Chair of the Board Human Resources and Remuneration Committee	If you feel that your concerns cannot be, or are not, adequately addressed by the Group's Integrity Officers or via the Integrity Line, you may contact the Chair of the Board Human Resources and Remuneration Committee in writing, by post to: The Chair of the Board Human Resources and Remuneration Committee Integrity Line (Confidential) PO Box 344, Strathpine, Queensland, Australia 4500

The role of Recipients is to ensure that the information is heard by the Company and proper follow-up occurs, as well as to ensure that you feel supported and protected. You can make your report to the Recipients by using any of the methods listed above.

The Group has established the role of Integrity Officer to oversee the appropriate investigation, management and resolution of Potential Misconduct.

People must not discourage any individual from Speaking Up and to do so will itself breach this Policy. If any person is told not to raise or pursue a concern, even by their manager or a person in authority, they are encouraged to make a further Disclosure to a different Recipient.

While we encourage you to Speak Up to one of the Recipients listed in the table above, there are certain other people to whom you can report and still receive the legal protections described in section 11 below, who are listed in Attachment 1.

6 What information should I provide?

You should provide as much information as possible, including details of the Potential Misconduct, people involved, any witnesses to the Potential Misconduct, dates, times and locations, and if any more evidence may exist.

You are encouraged to feel supported and safe in providing information, and to consent to the limited sharing of your identity. This will assist the Company to protect and support you in relation to your Disclosure and facilitate the Company in investigating, reporting and taking action arising as a result of your Disclosure.

Please be aware that if you do not consent to the limited sharing of your identity as needed, this may limit the Company's ability to progress your Disclosure and take any action in respect of your Disclosure.

The details of your Disclosure will only be accessible by those involved in the investigation, who will use that information to determine the appropriate response to Disclosures made and to inform any investigation commenced. If any of these people are or may be implicated in your Disclosure, they will not be able to access that information.

7 What if the information is incorrect?

When Speaking Up you will be expected to have reasonable grounds to believe the information you are disclosing is true, but you will still be protected under this policy even if the information turns out to be incorrect. However, you obviously must not make a report that you know is not true or is misleading.

Where it is found that a person has knowingly made a false report, this may be a breach of the Company's Code of Conduct and will be considered a serious matter that may result in disciplinary action, up to and including termination of employment or engagement. Any such disciplinary action will not be considered detrimental treatment of a person because they have spoken up.

8 Can I make an anonymous report?

You can make an anonymous report if you do not want to reveal your identity when reporting Potential Misconduct under this Policy.

The Company encourages the reporting of Potential Misconduct, however we appreciate that Speaking Up can be difficult.

We encourage you to provide your name because it will make it easier to investigate and address your report. However, you are not required to do so, and may choose to remain anonymous when making a Disclosure, over the course of the investigation and after the investigation is finalised.

If you do not provide your name, any investigation will be conducted as best as possible in the circumstances. The Company will assess the content and merit of your Disclosure in the same way as if you had revealed your identity. However, an investigation may not be possible unless sufficient information is provided, and it may be difficult to offer you the same level of practical support if we do not know your identity. You will still be entitled to protections under the law, as applicable (see Attachment 1).

If you do provide your name, it will only be disclosed if you provide your consent, or in exceptional circumstances where the Disclosure is allowed or required by law (e.g. in dealings with a regulator). Details of how your identity will be protected are described in section 11.1 below. If you have concerns about this, you can discuss this with the Recipient.

9 How will the Company respond to a report?

All reports made under this Policy will be received and treated sensitively and seriously, and will be dealt with promptly, fairly and objectively. The Company will apply the protections described at section 11 below when responding to Disclosures or investigating Potential Misconduct.

The Company's response to a report will vary depending on the nature of the report and the amount of information provided. Your report may be addressed and resolved informally (such as assisting employees to change their behaviour) or through formal investigation.

The Company's response to Disclosures made under this Policy will generally be overseen by the Integrity Officers, subject to any potential conflicts of interests or concerns. Integrity Officers are supported by the Workplace Relations team in the discharge of their obligations under this Policy. If the Disclosure relates to an Integrity Officer or the Chair of the Board Human Resources and Remuneration Committee considers it would be inappropriate, the Chair of the Board Human Resources and Remuneration Committee will oversee the Company's response. Any investigation that occurs will be conducted by people who are objective and independent of the team or business unit concerned in the report, which may include other employees or external advisers.

If appropriate, Disclosers will be told how the Company has decided to respond to their Disclosure, including whether an investigation will be conducted. This may not occur until after an investigation has been concluded. However, it may not always be appropriate to provide Disclosers with this information, and may not be possible unless contact details are provided when Speaking Up.

While Speaking Up does not guarantee a formal investigation, all reports will be properly assessed and considered by the Company and a decision made as to whether they should be formally investigated or internally resolved.

Any investigations commenced will be conducted in a timely manner and will be fair and independent from any persons to whom the report relates. Timeframes will vary depending on the particular investigation and will depend on a number of factors, for example, the complexity, the scope of the matter, the number of people to be interviewed, whether expert advice is required etc. However, the Company endeavours to investigate each matter as soon as reasonably practicable after the matter has been reported.

All employees and contractors must cooperate fully with any investigations.

Unless there are confidentiality or other reasons not to do so, persons to whom a Disclosure relates will be provided with details of the report that involves them at an appropriate time (to the extent permitted by law) and be given an opportunity to respond.

10 What happens after an investigation?

The results of any investigation will be recorded in writing in a formal internal report that will be confidential and is the property of the Company. The outcome of any investigation will be reported to the Board Human Resources and Remuneration Committee in accordance with section 12 below.

The formal report recording the results of an investigation will not be provided to a Discloser or any other person subject to or implicated in an investigation.

Where an investigation identifies a breach of the Company's Code of Conduct or internal policies or procedures, by any person employed by SRG, appropriate disciplinary action may be taken. This may include but is not limited to terminating or suspending the employment or engagement of a person(s) involved in any misconduct.

11 What protections exist if I Speak Up under the Policy?

The Company is committed to protecting people who Speak Up under this policy. This section outlines the Company's policy on protecting those who Speak Up. The law also contains protections for Disclosers, which are summarised in Attachment 1.

11.1 Protecting your identity

The Company will look to protect the identity of people who Speak Up about Potential Misconduct under this Policy. Your identity (and any information the Company has because of your report that someone could likely use to work out your identity) will only be disclosed if:

- you give your consent to the Company to disclose that information;
- the Disclosure is allowed or required by law (for example, the disclosure by the Company to a lawyer in order to get legal advice); or
- in the case of information likely to identify you, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out your identity.

The measures which the Company may adopt to protect your identity may include some or all of the following, as appropriate in the circumstances:

- using a pseudonym in place of your name;
- communications may be undertaken through anonymous telephone hotlines and anonymised email addresses;
- redacting personal information or references to you;
- referring to you using gender-neutral language;
- where possible, consulting with you to help identify the aspects of your Disclosure that could inadvertently identify you;
- ensuring paper and electronic documents and other materials relating to your Disclosure are stored securely;
- limiting access to all information relating to a Disclosure to those directly involved in managing and investigating the report;
- use of equipment and correspondence (such as printers or email addresses) that can only be accessed by appropriate persons;
- only disclosing your identity or information that is likely to lead to your identification to a restricted number of people who are directly involved in handling and investigating the Disclosure; and
- reminding each person who is involved in handling and investigating a Disclosure about the confidentiality requirements, including the consequences of an unauthorised Disclosure.

If your report qualifies for legal protection as set out in Attachment 1, your identity and information that is likely to lead to another person identifying you are protected at law. If a person makes an unauthorised Disclosure of your identity, the person may breach the law and you may be able to seek legal recourse. In some circumstances, this may also be a criminal offence.

11.2 Protecting you from detriment

No person may victimise or cause detriment to someone else (or threaten to do so) because of a belief that person has, will or could Speak Up. Examples of detriment include discrimination, harassment, intimidation, retaliation, causing physical or psychological harm, damaging property, varying an employee's role or duties, or demoting or dismissing the person.

If your report qualifies for legal protection as set out in Attachment 1, you are legally protected from detriment. If a person causes detriment or victimises you, or threatens to do so, the person may breach the law and you may be able to seek legal recourse. In some circumstances, this may also be a criminal offence.

You should tell a Recipient listed in section 5 if you are or someone else, is being subjected to detrimental conduct, if you have been or someone else has been subject to detrimental conduct, or if you are concerned that you may be victimised. Preferably, this should be the Recipient to which you made your initial Disclosure, but can be to any Recipient. The Company will treat this very seriously.

Any person involved in detrimental conduct will be subject to disciplinary action, including but not limited to termination of employment or engagement. In some circumstances, this may also be a criminal offence punishable by imprisonment. The Company may refer any person that has engaged in victimising conduct to law enforcement authorities for further investigation.

11.3 Other protections available

The Company is committed to making sure that you are treated fairly and do not suffer detriment because you Speak Up. The protections offered will depend on things such as the Potential Misconduct and people involved. Protections may include the following, in the Company's discretion and as appropriate in the circumstances:

- monitoring and managing the behaviour of other employees;
- relocating employees (which may include the people alleged to have been involved in the Potential Misconduct) to a different division, group or office, or reassignment of duties (of either you or other persons connected to the report made by you);
- offering you a leave of absence or flexible workplace arrangements while a matter is investigated;
- a Discloser who is a current employee may access the Company's wellbeing, medical and safety partner, Sonder and may also request additional support from the Company (such as counselling or other support services); and/or
- rectifying any detriment that you have suffered.

The Integrity Officers and/ or the Workplace Relations team supporting the Integrity Officers will be your point of contact to support and help protect you. They can arrange additional support for you where needed and can escalate any concerns you have with how your report is being dealt with.

The Company will look for ways to support all people who Speak Up, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. Where certain support cannot be applied to non-employees (for example, because the Company cannot itself offer flexible working arrangements to a supplier), the Company will still seek to offer as much support as practicable.

Further information regarding the protections afforded under Australian law to persons who Speak Up is available at Attachment 1.

12 Reporting

The Chair of the Board Human Resources and Remuneration Committee will be provided information about any material incidents raised, promptly after reports are received.

The Board Human Resources and Remuneration Committee will periodically receive a summary of reports made under this Policy. Where appropriate, issues may be escalated to the Board.

13 Availability of this Policy and training

The Company will inform officers and employees (including new officers and employees) about this Policy. Each officer and employee will receive a copy of this Policy and be provided with training about the Policy and their rights and obligations under it.

Key officers and employees, including Recipients, will receive regular training, including in relation to how to respond to Disclosures.

A copy of this Policy will also be available on the Company's intranet and on the Company's public website at www.superretailgroup.com.au.

14 Further information

Any questions about this Policy or Speaking Up about Potential Misconduct under this Policy can be referred to the Integrity Officers or the Integrity Line as referred to above. Questions can be asked at any time, including before or after you have made a report under this Policy.

This Policy will be reviewed from time to time and amended as required.

This Policy does not form part of terms of employment and may be amended from time to time.

Related documents which you can refer to via the Company's public website include:

- Code of Conduct;
- Anti-Bribery and Corruption Policy; and
- Workplace Resolution Policy.

Document details

Effective Date	1 September 2026
Policy Owner	Chief Legal Officer and Company Secretary
Policy Approver	Board of Directors
Version	2.0

Attachment 1

Protections provided by law

1 Additional legislative protections

Under Australian law, including the *Corporations Act 2001* (Cth) (the **Act**), legislative protections for Speaking Up are available to certain persons (including current and former employees, volunteers, officers, contractors, suppliers, employees of suppliers, associates, as well as these people's relatives and dependants) who make a protected disclosure to certain people.

You are encouraged to Speak Up under this Policy. However, the law offers protections in other cases (for example, you can report Potential Misconduct to people other than Recipients). If you make a protected disclosure under the law that does not comply with the Speak Up Policy, you will still be entitled to the legal protections. A disclosure can qualify for protection under the Act even if it is made anonymously or turns out to be incorrect.

Please contact a Recipient if you would like more information about legal protections.

2 Protected disclosures

To be a protected disclosure qualifying for protection under the Act, the disclosure must relate to a disclosable matter and be made to an eligible recipient under the Act. A matter that is disclosed under the Policy but which does not meet these criteria will not qualify for protection under the Act. Examples of this information and recipients are outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
General disclosable matters • Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to the Company or a related body corporate. • Information that the Company or a related body corporate, or any officer or employee of the Company or a related body corporate, has engaged in conduct that: ○ contravenes or constitutes an offence against certain legislation (e.g. the Act); or	**Recipients for any general disclosable matters** • A person authorised by the Company to receive protected disclosures – i.e. Recipients under this Policy (see section 5). • An officer or senior manager of the Company or a related body corporate. • An auditor, or a member of an audit team conducting an audit, of the Company or a related body corporate. • An actuary of the Company or a related body corporate.

Information reported or disclosed	Recipient of disclosed information
○ represents a danger to the public or the financial system; or ○ constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. Note that personal work-related grievances are not protected disclosures under the law, except as noted below.	• ASIC, APRA or another Commonwealth body prescribed by regulation. • A legal practitioner for the purposes of obtaining legal advice or legal representation (even if the legal practitioner concludes the disclosure does not relate to a disclosable matter). • Journalists or parliamentarians, under certain circumstances allowing emergency and public interest disclosures. It is important for you to understand the criteria for making a public interest or emergency disclosure before doing so. Please contact the Company's Chief Legal Officer if you would like more information about emergency and public interest disclosures.
Tax-related disclosable matters • Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the Company or an associate, which the employee considers may assist the recipient to perform functions or duties in relation to the tax affairs of the Company or an associate.	**Recipients for any tax-related disclosable matters** • A person authorised by the Company to receive reports of tax-related disclosable matters. • An auditor, or a member of an audit team conducting an audit, of the Company. • A registered tax agent or BAS agent who provides tax services or BAS services to the Company. • A director, secretary or senior manager of the Company. • An employee or officer of the Company who has functions or duties that relate to the tax affairs of the Company. • A legal practitioner for the purpose of obtaining legal advice or legal representation.
Further tax-related information Information that may assist the Commissioner of Taxation to perform his or her functions or duties under a taxation law in relation to the Company or an associate.	**Recipients for any further tax-related information** • Commissioner of Taxation. • A legal practitioner for the purpose of obtaining legal advice or legal representation.

Personal work-related grievances

Legal protection for disclosures about solely personal employment related matters are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if, in summary:

- it concerns detriment to you because you have or may be considering Speaking Up; or
- it is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about whistleblowers.

Under the law, a grievance is **not** a 'personal work-related grievance' if it:

- has significant implications for an entity regulated under the law that do not relate to the discloser;
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;
- concerns conduct or alleged conduct that represents a danger to the public or financial system; or
- concerns conduct or alleged conduct prescribed by the regulations.

3 Specific protections and remedies

Additional legislative protections may also be available, including but not limited to:

- compensation for loss, damage or injury suffered as a result of detrimental conduct;
- an injunction to prevent, stop or remedy the effects of the detrimental conduct;
- an order requiring an apology for engaging in the detrimental conduct;
- if the detrimental conduct wholly or partly resulted in the termination of an employee's employment, reinstatement of their position;
- exemplary damages; and
- any other order the court thinks appropriate.

You are also protected from the following in relation to a protected disclosure you make:

- civil liability (e.g. any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (e.g. attempted prosecution of you for unlawfully releasing information, or other use of the disclosure against you in a prosecution (other than for making a false disclosure)); and
- administrative liability (e.g. disciplinary action for making the disclosure).

However, you will not have immunity for any misconduct you have engaged in that is revealed in a disclosure.

Attachment 2

Additional protections provided by law

1. New Zealand

Under New Zealand law, including the *Protected Disclosures (Protection of Whistleblowers) Act, 2022* (the **POW Act**), legislative protections for Speaking Up are available to whistleblowers making disclosures that meet certain criteria. In particular you must:

- believe on reasonable grounds that there is, or has been, "serious wrongdoing" in or by the Group;
- disclose that information in accordance with the POW Act; and
- not make the disclosure in bad faith.

If you make a protected disclosure about "serious wrongdoing" and a person causes detriment or victimises you, you may have a claim under the *Employment Relations Act 2000 (NZ)* or the *Human Rights Act 1993*.

In relation to any protected disclosure, the Group will use its best endeavours to keep confidential any information that might identify you. However, the Group need not keep your identity confidential if:

- you consent to the release of the identifying information and the Group has consulted with you about the release of the information; or
- where there are reasonable grounds to believe that the release of the identifying information is essential for the effective investigation of the disclosure; or to prevent a serious risk to public health, public safety, the health or safety of any individual or the environment; or to comply with principles of natural justice; or for the purposes of law enforcement.

Such protections are only available when disclosures are made internally in accordance with this Policy.

The POW Act also protects disclosures made to appropriate authorities including:

- the head of any public sector organisation;
- any officer of Parliament;
- (as examples) the persons or bodies specified in Schedule 2 of the POW Act; or
- the membership of a particular profession, trade or calling with the power to discipline its members;

but does not include a Minister or a member of Parliament.

The protections afforded by the POW Act do not apply where you make an allegation which you know to be false or you otherwise act in bad faith.

Please contact a Recipient if you would like more information about legal protections in New Zealand.

2 China

Disclosers in China may be entitled to further protections under the People's Republic of China Law (**PRC** Law):

- "Who can Speak Up" under section 4 of this Speak Up Policy extends to individuals or entities who possess relevant information and can provide supporting evidence.
- in addition to section 9 of this Speak Up Policy, the Company will comply with its obligations under the Civil Code in relation to disclosures relating to sexual harassment; and
- as regards section 11.3 of this Speak Up Policy, PRC Law requires the employee's consent (or the existence of some other statutory ground) to relocate an employee to a different division, group or office or to reassign a team member's duties.