

IDT WHISTLEBLOWER POLICY

1. Introduction

This Whistleblower Policy (Policy) has been adopted to ensure that people can raise concerns regarding actual or suspected contravention of our ethical and legal standards without fear of reprisal or feeling threatened by doing so.

This Policy aims to:

- encourage people to report an issue if they genuinely believe someone has contravened our policies or the law;
- outline how IDT will properly deal with all reported misconduct or unethical behaviour, and
- assist in ensuring that serious misconduct or unethical behaviour is identified and dealt with appropriately.

2. Who Does This Policy Apply To?

This Policy applies to all employees and officers of IDT, whether full time, part time or casual at any level of seniority wherever employed.

3. What Sort of Concerns Should be Reported?

All employees are encouraged to report any genuine matters or behaviours that they honestly believe contravene company policy or the law. For the purposes of making a report under this Policy, matters may include any actual or suspected:

- conduct or practices which are illegal or breach any law;
- breach of any of IDT's policies;
- corrupt activities;
- theft, fraud or misappropriation;
- significant mismanagement or waste of funds or resources;
- abuse of authority;
- serious harm to public health, safety or environment or the health and safety of any employee; or
- any action taken against, or harm suffered by an employee as a result of making report under this Policy.

4. Who Can You Talk To?

If you become aware of any matter or behaviour you think contravenes IDT's Code of Conduct, policies or the law, then you should:

- take the matter up with your immediate supervisor or manager;
- report the matter to a more senior manager, or the Company Secretary; or
- report the matter to the Company Chairman or Chairman of Audit Committee.

5. What Happens After a Report is Made?

We will investigate all reported concerns appropriately and will, where applicable, provide feedback regarding the investigation's outcome. We will take the necessary course of action in response to a report and if no action is taken we will give you an explanation.

Your identity and the fact that you have made a report and the contents of the report will be kept confidential and no details of your participation in this process will be included in your personnel file or performance review. The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report.

6. What Happens to You as a Whistleblower?

You will not be discriminated against or disadvantaged in your employment with IDT for making a report in accordance with this Policy, nor will you receive reprisals due to your actions in making a report. IDT will take all reasonable steps to ensure that adequate and appropriate protection is being provided for those who, in good faith, make a report. This protection applies if the matter is proven or not, regardless of whether it is reported to an external authority.

Whistleblowing is not about airing a grievance. It's about reporting real or perceived malpractice. A report may damage the career prospects and reputation of people who are the subject of serious allegations and therefore if your report is not made in good faith or is found to be malicious, deliberately misleading or frivolous, you may be subject to disciplinary action.

7. Access to This Policy

This Policy will be available for viewing on IDT's website.