

# Whistleblower Policy



At Canva, our values to Be A Good Human and A Force For Good guide us every day – from the way we design our products, to the way we interact and treat each other. We believe that fairness and transparency is critical to a successful team. This is why we're committed to continuing to build a culture of honesty and integrity in everything we do, including the way we've designed our Whistleblower Policy to protect anyone that comes forward to report a concern.

 Employment  
Legal  
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## Purpose and Overview

Our Whistleblower Policy is designed to help you feel comfortable raising concerns about suspected wrongdoing at Canva, knowing that Canva will take steps to support you and protect you from detriment.

This policy does not stop you from raising a concern directly with your Coach or the People team, however, we encourage you to use this policy if you feel like reporting a concern to a Coach or the People team will not resolve the issue, or you do not feel comfortable doing so.

Canva's Speak Up Squad, led by the Workplace Integrity team, is responsible for the Whistleblower Policy and is the best point of contact for you if you have any questions.

### Where you can find this policy

This policy is shared during onboarding at Canva and is made available via the Canvanaut Hub on Confluence. You may be invited to attend training sessions to ensure ongoing education regarding the application of this policy.

### Supplementary resources

Annexures with local information about protections that apply in certain locations form part of this policy.

You should read this policy alongside the annexure that applies to your location (if there is one). If there is not an annexure for your location, this Global Policy will apply to you.

If there's an inconsistency between this policy and an annexure, the annexure takes precedence. Please note that the annexures should not be taken as legal advice or an exhaustive summary of your legal rights.

## Protection for Whistleblowers

If you're an Eligible Whistleblower who reports a concern or suspected wrongdoing at Canva (including anonymously) through Canva's Speak Up platform or to other Eligible Recipients (outlined in the annexures), you will be protected as a whistleblower under the relevant laws and this policy.



## If you're an Eligible Whistleblower...

That is, any person who is or has been, any of the following at Canva, Inc. or any of its subsidiaries ('Canva/the Company'):

- Employee;
- Officer;
- Director; or
- Contractor.

Other people may also qualify as Eligible Whistleblowers in particular locations (see your location-specific annexure for more information).



## And you disclose Reportable Conduct (anonymously if you choose)...

Reportable Conduct includes conduct that is:

- dishonest, fraudulent or corrupt;
- illegal (such as theft, dealing in or using illicit drugs, violence or threatened violence);
- a material breach of Canva's policies such as the Code of Ethics;
- oppressive or grossly negligent;
- potentially damaging to Canva, its employees or a third party;
- represents a danger to the public or financial system;
- a failure to comply with, or a breach of, regulatory requirements; or
- any country-specific conduct referred to in the annexure for your location.

It does not generally include personal work-related grievances (outlined in the 'What is not protected' section below.)



## to Speak Up (or an Eligible Recipient)

- [canva.whispli.com/pages/speakup](https://canva.whispli.com/pages/speakup); or
- other persons outlined in the annexures.



## You will be protected

You will be protected from detrimental conduct and your identity will be protected as outlined in the 'How will you be protected' section below. The law may also offer you protections in certain circumstances (see your location-specific annexure for more information).

## How you will be protected

Canva is committed to ensuring that any person who makes a disclosure is treated fairly and protected. This section summarises your protections when you make a disclosure. The law may also offer you protections in certain circumstances, including as summarised in the annexures.

3.1

### Protection against detrimental conduct

Canva (or any person engaged by Canva) will not cause or threaten 'detrimental conduct' against you because you have made, will make, or could make, a disclosure under this policy.

#### Examples of detrimental conduct include:

- termination of employment;
- demotion or disciplinary action;
- alteration of your position or duties to your detriment;
- discrimination;
- harassment, bullying or intimidation;
- victimisation;
- harm or injury, including psychological harm;
- damage to your property, reputation or financial position; or
- any other damage to you.

Canva will at all times be able to raise and address with a whistleblower any matters that arise in the ordinary course of their employment or contractual relationship with Canva (for example, any separate performance or misconduct concerns).

Canva also strictly prohibits all forms of detrimental conduct against any person because of their involvement in an investigation of, or a response to, a matter disclosed under this policy.

Canva will take appropriate actions to protect you from detrimental conduct. If appropriate, this may include supporting you to work from another location, reassigning you to another role (with the same role profile) or making other changes to your work environment or your duties to protect you from the risk of detriment.

## Section 3.0

If you are not an employee, Canva will seek to offer as much support as possible and appropriate, but it will not be possible to provide you with the same type or level of support that we provide to employees under this policy.

If you experience detrimental conduct as a result of making a disclosure under this policy or participating in an investigation, you should inform the Speak Up Squad or another eligible recipient referred to in this policy. See your location-specific annexure for more information.

If your disclosure qualifies for protection under the law in your location, you may legally be protected from detrimental conduct. See the annexure specific to your location for more information.

### 3.2

#### **Protection of Confidentiality**

Canva will take steps to protect the identities of people who make eligible disclosures under this policy. If you make an eligible disclosure under this policy, your identity (or any information which would be likely to identify you) will not be shared unless:

- you give your consent to share that information; or
- the disclosure is allowed or required by law (for example, to certain regulators, or to a lawyer for the purposes of Canva obtaining legal advice).

If your disclosure qualifies for protection under the law in your location, your identity and information that is likely to lead to another person identifying you may have the benefit of these confidentiality protections at law. See the annexure for your location for more information.

## Section 3.0



**The measures which Canva will take to protect your identity will depend on what is appropriate and necessary in the circumstances, but may include the following:**

- redacting all personal information or references to you;
- referring to you in a gender-neutral context;
- where possible, consulting with you to identify certain parts of your disclosure that could inadvertently identify you if shared with others;
- all paper and electronic documents and other materials relating to disclosures will be stored securely;
- access to all information relating to your disclosure will be limited to those directly involved in managing and investigating your disclosure;
- only people who are directly involved in handling and investigating your disclosure will be made aware of your identity (subject to your consent) or information that is likely to identify you;
- communications and documents concerning your disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and
- each person who is involved in handling and investigating your disclosure will be reminded about the confidentiality requirements, including the consequences of an unauthorised disclosure.

If you are concerned that there has been an unauthorised disclosure of your identity, you are encouraged to inform the Speak Up Squad or eligible recipient referred to in this policy.

## Section 4.0



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# What is not protected

While we strive to create an environment where everyone feels comfortable speaking up and reporting concerns, not everyone, and not all types of concerns, fall within this specific policy.

Reportable Conduct, in the context of this policy, does not generally include personal work-related grievances or customer/user complaints.

### Personal work-related grievances

A personal work-related grievance relates to an individual's current or former employment, which has or tends to have implications for that person personally.

You should report any personal work-related grievances to your People Partner or follow the Grievance Handling Procedure or Employee Handbook for your location.

#### Examples of personal work-related grievances include:

- an interpersonal conflict between employees;
- a decision relating to the engagement, transfer or promotion of the employee;
- a decision relating to the terms and conditions of engagement of the employee; or
- a decision to suspend or terminate the engagement of the employee, or otherwise to discipline the employee.

While personal work-related grievances will not generally be Reportable Conduct, they may be covered by this policy in certain circumstances. For example, if your disclosure:

- is about detriment that you have experienced or been threatened with because you made a disclosure about suspected Reportable Conduct;
- is about both a personal work-related grievance and Reportable Conduct; or
- has broader implications for Canva.

### Customer/user complaints

If you are a customer or user and are concerned about the way Canva has managed a matter, product or service, including an existing complaint, please contact Canva with your concern via this form.

## How to make a disclosure

If you become aware of or suspect any Reportable Conduct, you are encouraged to make a disclosure, knowing that Canva will take steps to support you and protect you from detrimental conduct. You do not need to know for a fact that something is true before making a disclosure about it, but you should have a reasonable belief that what you are disclosing is true. Deliberately making a false report is not acceptable and may lead to disciplinary action up to and including termination of employment or engagement. If you would like additional information before making a disclosure, you can confidentially contact the Speak Up Squad via [speakup@canva.com](mailto:speakup@canva.com).

5.1

### Report a disclosure through Canva's Speak Up platform



This option allows you to raise your concern online and communicate with the Speak Up Squad, either anonymously or by disclosing your identity.

The Speak Up platform can be accessed at [canv.am/speakup](https://canv.am/speakup) or via this QR code:



5.2

### Other ways to report a disclosure

While you are encouraged to raise suspected Reportable Conduct through Canva's Speak Up platform, which provides a secure channel for you to raise your concerns to a dedicated team, there may be additional people who you can make a report to under the law, depending on your location. Please refer to the annexures for more information.

5.3

### Your right to anonymity

You may choose to make a disclosure anonymously and remain anonymous during and after any investigation. However, please note it may be difficult for Canva to properly investigate your disclosure if it is submitted anonymously. We encourage you to share your identity when making a disclosure if you're comfortable in doing so, and we will take steps to ensure your identity remains confidential, however you are not required to share your identity to make a disclosure.



## How will Canva respond?

6.1

### Receiving the disclosure

Canva will aim to contact you within 2 business days to confirm we have received your disclosure.

6.2

### Investigating the disclosure

How Canva responds will depend on the subject matter of the disclosure and the amount of information provided. The disclosure may be dealt with informally or through formal investigation. While making a disclosure does not guarantee a formal investigation, rest assured that all disclosures will be properly assessed and a decision made by the Speak Up Squad about how best to address it.

If an investigation is appropriate, this will generally be overseen by the Speak Up Squad. The Speak Up Squad may appoint an internal or external investigator to assist in conducting the investigation. All investigations will be kept confidential and conducted in a fair, independent and timely manner.

If you have provided a way to contact you, the Speak Up Squad or investigator may contact you to discuss the investigation process and any other matters that are relevant to the investigation.

Where appropriate, the Speak Up Squad will aim to provide you with feedback on the progress and expected timeframes of the investigation on a regular basis. The length of the investigation will depend on the circumstances but where possible, Canva will aim to complete the investigation within 2 to 4 weeks. The person who is suspected of Reportable Conduct will also be informed of the concerns and will be given an opportunity to respond (unless there are any legal restrictions or other reasons for not doing so).

### What happens after the investigation

The Speak Up Squad will generally inform you and/or the person suspected of Reportable Conduct once an investigation has been completed. Please be aware that Canva may be unable to disclose particular details of the outcome of the investigation. This is to ensure fairness to all involved, and to protect the privacy of those who have raised concerns, as well as those who are the subject of the investigation. Canva will document the findings in an internal report, however any report will remain the property of Canva and will not be shared with you or any person against whom the allegations have been made.

Where the Reportable Conduct is substantiated, appropriate action will be taken. Depending on the conduct, this may include disciplinary action, up to and including termination of their employment or engagement.

## Section 7.0



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## Other Support Available

The [Canva Care Program](#), which offers free counselling sessions with an external professional is available to Canvanauts that need it as well as their extended family members.

Canva may also provide an independent person from the People team to support with any ongoing concerns, but we will ask for your consent first.

## Section 8.0



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## Further Information

### **Breach of policy**

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of a person's engagement with Canva.

Employees are encouraged to read this policy alongside other relevant Company policies, including the [Code of Ethics](#) and [Anti-bribery and Corruption Policy](#).

### **Variation**

Canva aims to create a workplace that everyone values being a part of, which is why we're consistently reviewing policies and may unilaterally amend, remove or replace this policy from time to time. Any obligations on Canva throughout this Policy are guides only that are subject to change and are not contractual terms, conditions or representations to rely on.