Whistleblower Protection Policy





G&C Mutual Bank Limited trading as Unity Bank & Reliance Bank. ABN 72 087 650 637. AFSL & Australian Credit Licence 238311.

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Policy Information				
Authority and Review	G&C Mutual Bank's Board last reviewed this Policy on 4 February 2025.			
Version	2			
Relevant Legislation	 ASIC Act 2001 Banking Act 1959 Corporations Act 2001 (Cth) Financial Sector (Collection of Data) Act 2001 Income Tax Assessment Act National Consumer Credit Protection Act 2009 Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 Taxation Administration Act 1953 (Cth) APRA Prudential Standard 510 Governance APRA Prudential Standard 520 Fit and Proper ASIC Regulatory Guide 270 Whistleblower Policies 			
Related Policies and Procedures	 Board Audit Committee Charter Board Risk Committee Charter Governance & Board Renewal Policy & Board Charter Fit and Proper Policy People & Culture Policy Respect@Work Policy Code of Conduct Workplace Bullying, Anti-Discrimination and Harassment Policy 			

1. Purpose

- 1.1 G&C Mutual Bank is committed to best practice in corporate governance, compliance, and ethical behaviour generally. G&C Mutual Bank is committed to maintaining a culture that ensures integrity, openness, accountability, and ethical behaviour are practiced by employees, Directors, and contractors. Ensuring these values are reflected in our business is part of G&C Mutual Bank's sound risk management practice.
- 1.2 The Board has adopted a policy that provides a framework for employees, Directors, contractors (and their employees) to bring to the attention of the Board or Executive Management reports of unethical, unlawful, or improper conduct.
- 1.3 This Policy protects individuals who have reasonable grounds to suspect that the information being reported is:
 - Dishonest
 - Fraudulent
 - Corrupt
 - Illegal
 - In breach of legislation or regulatory requirements
 - Unethical
 - Improper in the circumstances
 - Contrary to safe work practices
 - or
 - Of a type that would otherwise fall within the definition of Reportable Conduct as defined in this Policy.

2. Scope of this Policy

- 2.1 This Policy applies to current and former:
 - G&C Mutual Bank's Directors and employees
 - G&C Mutual Bank's contractors
 - Employees and sub-contractors of G&C Mutual Bank's contractors (referred to as contractors) and
 - Current and former relatives and dependents of the above.
- 2.2 In this Policy, each person in the categories listed above is referred to as a G&C Mutual Bank person.
- 2.3 For those individuals deemed to hold a Responsible Person position in accordance with G&C Mutual Bank's Fit and Proper Policy, this Whistleblower Protection Policy must be read in conjunction with that policy.

3. Risk Consequences

- 3.1 A failure to comply with this policy could lead to:
 - Civil penalties and/or fines for individuals and/or G&C Mutual Bank
 - Potential whistleblowers being discouraged from making disclosures, which may continue the real or perceived improper conduct
 - Undiscovered financial and/or non-financial loss for G&C Mutual Bank
 - Whistleblowers suffering detriment, because of a failure to keep their report or identity secure.

4. Definitions

- 4.1 **Detriment** includes, but is not limited to, any of the following:
 - Dismissal, demotion, adverse changes to duties or conditions
 - Harm or injury of an employee in the course of their employment
 - Discrimination between an employee and other employees
 - Alteration of position or duties to create a disadvantage
 - Discrimination, harassment, or intimidation of a person
 - Damage to a person's reputation, property and
 - Any other damage.
- 4.2 **Detrimental Conduct** means conduct or a threat to engage in conduct, that causes detriment to an eligible whistleblower.
- 4.3 **Eligible Recipients** means disclosures by a whistleblower will be protected when the disclosures are made to any of the following persons:
 - The CEO
 - The Deputy CEO/Company Secretary
 - The Chair of the Board Risk Committee
 - A member of the Executive Management Team
 - The General Manager Internal Audit or
 - any of the external bodies eligible to receive disclosures listed in Appendix A including a legal practitioner, External Auditors APRA, ASIC or the Australian Taxation Office (ATO).
- 4.4 **Protected Disclosure** means to qualify as a protected disclosure under the provisions of this Policy, the report must be regarding information that the whistleblower has reasonable grounds to suspect is misconduct or an improper state of affairs or circumstances. The term "reasonable grounds to suspect" is based on the objective reasonableness of the reasons for suspicion.
- 4.5 **Relevant Person** means anyone who is, or has been, employed by or works, or has worked at G&C Mutual Bank including:
 - Existing and former employees
 - Existing and former Directors
 - Contractors and their employees
 - Current or former relatives or dependents of G&C Mutual Bank persons
- 4.6 **Reportable Conduct** means for the purpose of this Policy:
 - Corrupt conduct (including soliciting, accepting, or offering a bribe, facilitation payments or other such benefits)
 - Fraudulent conduct
 - Conduct involving substantial mismanagement of G&C Mutual Bank's resources
 - Conduct involving substantial risk to public health or safety or
 - Conduct involving substantial risk to the environment that would, if proven, constitute:
 - A criminal offence
 - An offence against any other law of the Commonwealth that is punishable by imprisonment for 12 months or more
 - A danger to the public or financial system; or
 - A serious breach of G&C Mutual Bank's policies and procedures.

- 4.7 **Whistleblower** is defined as any current or former:
 - Director
 - employee
 - contractor of G&C Mutual Bank
 - employee of a contractor and
 - current or former relatives or dependents of a G&C Mutual Bank person who, whether anonymously or not, makes or attempts to inform any reportable conduct.
- 4.8 **Whistleblowing** means the voluntary disclosure of individual or organisation wrongdoing by a person who has or had privileged access to data, events, or information about an actual, suspected, or anticipated wrongdoing within or by G&C Mutual Bank.
- 4.9 **Whistleblower Investigation Officer** (WIO) is responsible conducting the investigation into the protected disclosure. The WIO will be appointed by the WPO and must be independent to the business area or the individual under investigation.
- 4.10 **Whistleblower Protection Officer** (WPO) is responsible for protecting the confidentiality and anonymity of the Whistleblower and protecting them from adverse repercussions and detriment.

5. Reporting Mechanism

5.1 This policy complements normal communication channels for raising concerns. G&C Mutual Bank has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. Employees are encouraged to speak to the People & Culture Department or anyone in Executive Management with whom the employee is comfortable in approaching.

However, where an employee feels unable to raise a concern via normal communication channels and where the matter falls within the definition of "reportable conduct" an employee can make a protected disclosure to the CEO, Deputy CEO, Executive Management or General Manager - Internal Audit which enables formal whistleblower protection in accordance with this Policy.

- 5.2 It is G&C Mutual Bank's objective to ensure that there is a clear process for raising concerns internally, however, nothing in this Policy should be interpreted as restricting a person from raising reportable conduct directly to other external prescribed entities or persons who can receive reports in accordance with any relevant law, regulation, or prudential standard application, applicable in a jurisdiction in which G&C Mutual Bank operates.
- 5.3 Public interest and Emergency Disclosures are permitted subject to specified circumstances. Refer Annexure A for further details about the procedures that must occur before a public interest or emergency disclosure can be made.
- 5.4 This Policy does not apply to member complaints. Any member complaint can be made in a Service Centre, over the phone by calling 1300 364 400 or online via the secure feedback form located on G&C Mutual Bank's website <u>www.gcmutual.bank</u> or email via <u>info@gcmutual.bank</u>.
- 5.5 For contact details of the prescribed entities and persons who can receive reports refer to Appendix A.

6. **Protection Under This Policy**

6.1 Whistleblower Protection

6.1.1 To be protected as a whistleblower the person must be a current or former:

- Director of G&C Mutual Bank
- Employee of G&C Mutual Bank
- A contractor, or, the employee or sub-contractor of a contractor, who has a current contract to supply goods or services to G&C Mutual Bank or
- Current or former relatives or dependents of any of the above.
- 6.1.2 Anonymous reports can be received and are protected under this Policy, however, if the identity of the whistleblower is not shared there may be some practical limitations in investigating.
- 6.1.3 Whistleblowers that make a report in accordance with this Policy are protected against any detrimental conduct, including being dismissed or penalised by G&C Mutual Bank.
- 6.1.4 A whistleblower can choose to remain anonymous over the course of the investigation and after the investigation is finalised.
- 6.1.5 A whistleblower who wishes to remain anonymous can refuse to answer questions concerning the report with the designated Whistleblower Protection Officer, Investigator or any other persons managing or dealing with the report they have made, if they feel it could reveal their identity.

6.2 **Prohibition on Victimisation**

- 6.2.1 G&C Mutual Bank's Directors, employees, and contractors must not engage in conduct causing detriment to a whistleblower or cause any whistleblower to be victimised, because a whistleblower has or proposes to make a report under this Policy.
- 6.2.2 Victimisation includes intimidation, harassment, threats, action causing injury and harm including psychological harm, loss or damage, discrimination, disadvantage, and adverse treatment in relation to a person's employment, career, profession, trade, or business.
- 6.2.3 G&C Mutual Bank will regard any such victimisation very seriously and take appropriate action, which may include, in the case of employees, disciplinary action and dismissal.
- 6.2.4 Civil penalties for both G&C Mutual Bank and individual G&C Mutual Bank persons may apply in respect of victimisation of a whistleblower.

6.3 Whistleblower Immunity

- 6.3.1 A whistleblower is given immunity from civil, criminal, or administrative liability (such as disciplinary action) for making a protected disclosure.
- 6.3.2 Information received from a protected disclosure is not admissible in evidence against the whistleblower in criminal proceedings or other penalty proceedings, except proceedings in respect of the falsity of the information.

6.4 Personal work-related grievances

- 6.4.1 Personal work-related grievances are excluded from the protection of this Policy except:
 - In circumstances where they concern alleged victimisation of the whistleblower
 - The disclosure has significant implications beyond the whistleblower or
 - The disclosure is made to a legal practitioner for obtaining legal advice or representation.

- 6.4.2 Personal work-related grievances are those that relate to current or former employees that only have personal implications, with no other significant implications for G&C Mutual Bank or other matters of misconduct beyond the personal circumstances.
- 6.4.3 Examples of this include interpersonal conflict between the whistleblower and another employee, or a decision about the engagement, transfer, promotion, performance management or termination of the whistleblower.
- 6.4.4 However, If the personal work-related grievance includes information about potential misconduct, or suggests misconduct beyond personal circumstances, the personal work-related grievance may qualify for whistleblower protection under this policy.
- 6.4.5 Examples of a personal work-related grievance mixed with personal misconduct include:
 - where there is a breach of employment or other laws punishable by imprisonment for a period of 12 months or more
 - engaging in conduct that represents a danger to the public, or an employee suffers from or are threatened with detriment for making a disclosure or
 - the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act or Tax Act.

6.5 Vexatious Complaints

6.5.1 Trivial, malicious, or vexatious complaints must not be made and do not qualify for protection under this Policy.

6.6 Protecting Confidentiality and Privacy

- 6.6.1 G&C Mutual Bank must not disclose the identity of a whistleblower, or information likely to lead to their identification unless:
 - The whistleblower consents to the disclosure
 - The disclosure is required by law or
 - The disclosure is necessary to protect or enforce G&C Mutual Bank's legal rights or interests.
- 6.6.2 G&C Mutual Bank will ensure that any records relating to a report of improper conduct are stored securely and are able to be accessed only by the authorised staff. The following measures will be followed to protect the confidentiality of a whistleblower's identity and to protect the whistleblower from detriment:
 - the whistleblower will be referred to in a gender-neutral context
 - all personal information or reference to the whistleblower will be removed in any recorded notes or material
 - protected disclosures will only be handled by the officers eligible to receive reports
 - all documents and communication with the whistleblower will be kept secure; and
 - support services (including counselling or other professional services) are made available.
- 6.6.3 Any unauthorised disclosure of the identity of a G&C Mutual Bank person who has made a report of improper conduct; or information, from which the identity of the reporting person could be inferred, will be regarded as a disciplinary matter, and will be dealt with in accordance with G&C Mutual Bank's disciplinary procedures.

6.7 Protection

- 6.7.1 G&C Mutual Bank is committed to the protection of genuine whistleblowers against action taken in reprisal for the making of protected disclosures.
 - This protection may involve relocation or leave of absence during the investigation where it may not otherwise be possible to maintain the anonymity of the whistleblower.

6.8 Privacy Issues

- 6.8.1 To the extent that any of the information recorded on G&C Mutual Bank's behalf constitutes "personal information" under applicable privacy legislation, it should be noted that:
 - The purpose of the collection of that information is to assist G&C Mutual Bank to respond to issues raised by the person providing the information, and/or to protect or enforce G&C Mutual Bank's legal rights or interests; and
 - Personal information may be used for the primary purpose for which it was collected or for any reasonably-related secondary purpose.
- 6.8.2 G&C Mutual Bank's policy is not to collect "sensitive information" without the consent of the person to whom it relates unless the collection is required by law, is necessary to prevent or lessen a serious and imminent threat to the person's (or another person's) life or health or is necessary in relation to legal proceedings (current, anticipated, or potential).
- 6.8.3 "Sensitive information" means information or an opinion about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a profession or trade, membership of a trade union, sexual preferences or practices, criminal record, or health.

7. **Reports and Investigations**

- 7.1 All reports made under this Policy must be in accordance with G&C Mutual Bank's Whistleblowing Procedures as outlined in Annexure A.
- 7.2 Members of G&C Mutual Bank's Executive Management Team and the General Manager -Internal Audit are designated officers for the purpose of receiving and investigating reports. Where a report is made under this Policy regarding a member of the Executive Management Team or General Manager - Internal Audit, the matter will be directly referred to the CEO (except where the report concerns the CEO) **or** the Chair of the Board Risk Committee.
- 7.3 A report made directly to the CEO, regarding an employee other than an Executive Manager, will be directed to an Executive Manager of G&C Mutual Bank for investigation. The investigating Executive Manager will not be able to investigate any matters that relates to their department.
- 7.4 A report made directly to the Chair of the Board Risk Committee will be dealt with by the Committee at its next meeting, or sooner if the Chair believes the seriousness of the report requires immediate attention, and the Committee will determine the method of investigating and evaluating the report depending upon the seriousness and the nature of the report.
- 7.5 A Whistleblower who makes a report in accordance with this Policy and the attached Whistleblower Procedures, has the right to have their investigation carried out in a fair, independent, and confidential manner. G&C Mutual Bank will ensure that:

- Each report will be assessed on its merits and investigated as appropriate
- All investigations will be conducted in a manner consistent with the rules of natural justice and devoid of bias or prejudice against any person against who the allegation is made.
- 7.6 The Whistleblower will be kept informed of the outcomes of the investigation, subject to considerations relating to the privacy of those against whom the allegations are made.
- 7.7 The person subject to the report will be advised and G&C Mutual Bank will ensure the fair treatment of all persons mentioned in a report from a whistleblower. G&C Mutual Bank will:
 - Handle reports confidentially when it is practical and appropriate to do so
 - Assess each report and investigate as appropriate
 - Determine through investigation whether there is enough evidence to substantiate or refute the matters reported
 - Where an investigation needs to be undertaken, will ensure the process will be objective, fair and independent
 - Advise the employee who is subject of a report as and when required by principles of natural justice and procedural fairness and prior to acting such as commencing an investigation
 - Advise the employee who is subject of a report that they may contact G&C Mutual Bank's EAP counselling service.

8. Outcome of Investigation

8.1 What happens after an investigation?

- 8.1.1 At the end of an investigation undertaken by management, the investigating Executive Manager will report their findings to the CEO, who will determine the appropriate response. At the end of an investigation undertaken by the Board Risk Committee, the Chair of that Committee will determine the appropriate response. In either case the response must include appropriate measures to rectify any improper conduct and to prevent any future occurrences of the same or similar conduct.
- 8.1.2 Where issues of discipline arise, the response will also be in line with G&C Mutual Bank's procedures for disciplinary matters. Where allegations of unacceptable conduct made against another person cannot be substantiated, that person will be advised accordingly and will be entitled to continue in their role as if the allegations had not been made.

8.2 Keeping the Whistleblower informed

8.2.1 Once the matter is completed an oral report will be made to the whistleblower. This report will explain the findings and actions taken, to the fullest extent possible within commercial, legal and confidentiality constraints. Where the whistleblower initiating the matter chooses to remain anonymous, providing a report of the outcome of the investigation to that person may be limited.

8.3 Policy Distribution and Training

- 8.3.1 This Policy will be provided to all new G&C Mutual Bank Persons during their induction and made available on the Director and Staff Intranet portals.
- 8.3.2 Notification of subsequent policy reviews or amendments will be received via standard internal communication channels and updated on Director and Staff Intranet portals.

8.3.3 This policy will be uploaded to G&C Mutual Bank's website <u>www.gcmutual.bank</u> for public access.

8.4 Training

- 8.4.1 Training on the Whistleblower Protection Policy will be provided at least biennially to all employees, with more broad training provided to G&C Mutual Bank persons approved to receive protected disclosures of reportable conduct; and
- 8.4.2 Director and staff training registers will be updated and maintained by the Company Secretary and the People and Culture Department.

9. Annexure A - Whistleblowing Procedures

Procedures for reporting incidences of "Reportable Conduct"

Steps	Action	
1.	If your concern or complaint and subsequent report falls under the provisions of t Whistleblowing Protection Policy, you should:	
	 Raise it with the CEO, Deputy CEO or any Executive Manager or General Manager - Internal Audit, either: In person 	
	 In writing via email, internal mail, Australia Post By telephone 	
	 On-line team meetings (such as Microsoft Teams, etc.,) 	
	 Email addresses for the G&C Mutual Bank persons who can receive reports are listed at Step 7 of these procedures. Otherwise, mobile contact numbers are available on the internal Phone Listing document available on the staff intranet. 	
	 Contact details for other prescribed entities or persons who can receive protected disclosures are listed at Step 7 of these procedures. 	
	 If you have provided a means to do so, you will be issued with a unique identifier so you can liaise with the relevant receiving officer or seek feedback. A pseudonym can also be used to protect anonymity if necessary. 	
	 If you believe your concerns or complaint may not have been satisfactorily addressed, you should refer your concerns to the Chief Executive Officer (CEO). 	
	Please note that any current or former Directors, employees, and contractors (and their employees or sub-contractors), relatives or dependents can refer concerns or complaints of a serious nature directly to the Chair of the Board Risk Committee. The individual receiving the complaint must ensure that the discloser of the complaint is aware of their rights to be protected.	
	To assist in the progress of a robust investigation it is important to provide enough information to form a reasonable basis for investigation. This includes any known details about the events underlying the report including: the date, time, location, name of person(s) involved, possible witnesses to the events and evidence of the events (e.g. documents, emails).	
2.	What you should do after you have disclosed your concerns:	
	 Carry out your normal duties and any reasonable directions from the receiving officer until the matter is resolved. 	
	 If you have reasonable grounds to suspect misconduct, you will be protected against any detrimental conduct for reporting those concerns. 	
	 Any G&C Mutual Bank Person who does anything, or threatens to do something, to the detriment of the whistleblower should be reported immediately to your assigned Whistleblower Protection Officer. 	
3.	What action will G&C Mutual Bank take:	
	 The receiving officer will be recognised as the Whistleblower Protection Officer (WPO); who will assign another Executive Manager who will be known as the Whistleblower Investigating Officer (WIO). The WIO, who is independent of the department where the 	

Steps	Action		
	reportable conduct is alleged to exist, will review the information, and decide whether the allegations raised should be investigated further.		
	 In handling the investigation, due process will be followed, and privacy considerations will apply. 		
	 A written report of the outcome of the initial investigation is required within fourteen (14) days of the report being made and provided to the receiving officer and/or the CEO. 		
	 An individual affected by the report will be given the opportunity to be aware of the allegations and evidence against them and to respond to such allegations. 		
	If the matter is deemed to be of a criminal nature, the police will be contacted.		
	 The whistleblower must maintain confidentiality of their report and not disclose details to any other person other than when assisting the investigation under the direction of the receiving officer. 		
	 The whistleblower will be kept informed throughout the investigation process, and if there is a means to do so, will be provided with a formal response, reporting findings at the completion of the investigation. 		
	 Matters referred to the CEO for investigation will, on resolution, be reported to the Board. 		
	 Reports made directly to the Chair of the Board Risk Committee will be investigated by that Committee. If there is a means to do so, the Whistleblower will be informed of the progress of any investigation and its outcome by the Committee. 		
4.	Anonymous Disclosures:		
	 Should an anonymous disclosure be received by G&C Mutual Bank that has sufficient supporting evidence to justify the claim, an investigation will be undertaken in accordance with the above procedures. 		
	 Where a report has been made anonymously the receiving officer will, if requested to do so, establish a means by which the whistleblower can be provided with ongoing status updates and/or a formal response and outcome of the investigation. A pseudonym can be used, or another variation of a unique identifier may be appropriate. 		
	An anonymous disclosure will be assessed in the same way as if a whistleblower has revealed their identity. However, there may be some practical limitations in conducting the investigation if the person does not share their identity; for example, should further information be required, and the investigating officer is unable to make contact.		
5.	Public Interest Disclosures:		
	 Public interest disclosures are permitted where: 		
	 The whistleblower has made a protected disclosure and: 		
	 At least 90 days has passed since that disclosure 		
	 The whistleblower does not have reasonable grounds to believe action is being/has been taken in response to the previous disclosure 		
	 The whistleblower has reasonable grounds to believe a further disclosure is in the public interest 		
	 After 90 days the whistleblower gives the recipient of the previous disclosure written notice of their intention to make a public interest disclosure 		
	 The public interest disclosure is no greater than is necessary to inform the recipient of the misconduct, improper state of affairs. 		

Steps	Action			
	Emergency Disclosures:			
	Emergency disclosures may be made if the whistleblower has:			
	 Reasonable grounds to believe the information concerns a substantial and imminent danger to the health or safety of person/s or to the natural environment 			
	 The whistleblower has made a previous disclosure and given prior written notice to the recipient of the previous disclosure before making the emergency disclosure. 			
6.	Additional Support:			
	eblower report or being the subject parties. Where appropriate, and with p appoint an independent support any ongoing concerns you may			
 Help is available face-to-face or over the phone by calling the company pro- Employee Assistance Program (EAP) on 1300 361 008 and quoting referen Services are also provided online by browser or by mobile app. 				
	 Immediate family members can also access the ser 	rvices of the EAP.		
	 Third party support services are available from prov and Beyond Blue (1300 22 4636) for support. 	viders such as Lifeline (13 11 14)		
7.	Prescribed Entities or Persons to receive protected conduct". Refer to current company phone listing ava contact details of the Executive Management Team.	ilable on the Intranet for mobile		
	Contact Name	Contact Email		
	CEO	dpavisic@unitybank.com.au		
	Deputy CEO /Company Secretary	rargall@gcmutual.bank		
	Chief Operating Officer	amehta@gcmutual.bank		
	Chief Financial Officer	aprichard@gcmutual.bank		
	Chief Investment Officer	kkaragiannis@unitybank.com.au		
	Chief Risk Officer	ktait@unitybank.com.au		
	General Manager – Banking, Sales & Services	svassalo@unitybank.com.au		
	General Manager – Impact & Sustainability	kjrobson@gcmutual.bank		
	General Manager – Marketing	sgriffiths@unitybank.com.au		
	General Manager – People & Culture	vtomic@gcmutual.bank		
	General Manager – Process Improvement, Product & Payments	labberton@gcmutual.bank		
	General Manager – Robotics & Strategic Banking	fking@unitybank.com.au		
	General Manager – Internal Audit	snandan@unitybank.com.au		
	Chair, Board Risk Committee Relationship Manager for G&C – EY Sydney	Contact via Company Secretary (02) 9248 5060		

Steps	Action		
	AFP	1300 237 677	
	APRA	1300 300 630	
	ASIC	1300 131 060	
	Commissioner of Taxation	13 28 69	
	Public Interest & Emergency Disclosures to: a journalist or parliamentarian		
 Parliamentarians include Federal, State and Territory parliamentarians. 			
	 Journalists must be "working in professional capacity as a journalist" for newspaper; magazine; radio; television; or "electronic service" provided on a commercial basis, or by a public broadcasting service, where the electronic service is "similar to a newspaper magazine, or radio or television". Personal social media is excluded. 		