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*Chief Compliance Officer*

# Whistleblower Protection Policy

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# 1. Overview

The Whistleblower Protection Policy (**the Policy**) is one of a number of Policies and Codes that promotes a culture of compliance, honest and ethical behaviour within the Westpac Group.

Westpac does not tolerate illegal, unacceptable, or undesirable conduct by our staff.

Westpac's aim is to encourage the internal reporting of any Wrongdoing in an environment free from victimisation so that the Board and Senior Management can adequately manage risk and cultural issues within Westpac.

## 2. Senior management commitment

Westpac's Senior Management encourages all staff to report Wrongdoing. Westpac's attitude is - "*when in doubt report*". All staff should feel confident and comfortable about reporting Wrongdoing.

Westpac's Senior Management is committed to protecting the dignity, wellbeing, career and good name of anyone reporting a Wrongdoing. This includes providing the necessary support.

Staff wishing to report Wrongdoings are encouraged to report the matter internally.

## 3. Objectives

The Policy describes Westpac's expectations and protections for reporting Wrongdoing. It explains the processes to report and investigate Wrongdoing including Westpac's intention to maintain confidentiality wherever possible and where required by law.

The Policy provides for the appointment of a Whistleblower Protection Officer and describes their responsibilities.

### 3.1 Westpac's Whistleblower commitment

- ✓ Provide effective channels for reporting Wrongdoing.
- ✓ Diligently investigate all Whistleblower reports.
- ✓ Protect the identity of a Whistleblower where requested and able to do so.
- ✓ Maintain confidentiality to the extent possible and appropriate.
- ✓ To the extent practicable and permissible by law, protect the identity of the person(s) believed to have engaged in Wrongdoing.
- ✓ Not tolerate victimisation against Whistleblowers who report Wrongdoing in good faith.

## 4. Scope

The Policy applies to all staff, including directors, managers, staff, secondees, contractors and consultants in all businesses and subsidiaries (including all offshore locations) within the Westpac Group.

To the extent that an overseas jurisdiction imposes a higher standard, those local standards are deemed to be incorporated into and supplement this Policy. Where a specific jurisdiction has additional Obligations (as advised by your local Legal or Compliance advisor) then the Obligation applies in addition to this Policy. For Westpac's overseas offices, please contact your relevant Legal or Compliance advisor to obtain these details.

Unique characteristics or legal requirements facing individual subsidiaries or offices may necessitate exceptions to this policy. The Chief Compliance Officer must be consulted and approve exceptions prior to implementation.

## 5. What is Wrongdoing?

Examples of Wrongdoing include, but are not limited to:

- A breach of regulations or laws.
- A breach of Westpac's Policies and Codes.
- Dishonest or corrupt behaviour, including soliciting, accepting or offering a bribe, facilitation payments or other such benefits.
- Fraudulent activity.
- Illegal activity (including theft, drug sale / use, violence or threatened violence and property damage).
- Impeding internal or external audit processes.
- Improper behaviour relating to accounting, internal accounting controls, actuarial, or audit matters.
- An activity that poses a substantial risk to the environment.
- A serious impropriety.
- Conduct endangering health or safety.
- A substantial mismanagement of Westpac's resources.
- Conduct that is detrimental to Westpac's financial position or reputation.
- Concealment of Wrongdoing.

## 6. Reporting Wrongdoing

A staff member can report Wrongdoing via two ways:

1. Normal reporting channels
2. Concern Online

### 6.1 Normal Reporting Channels

Depending on the nature of the Wrongdoing, the staff member is encouraged to first discuss their concern with their Manager.

Any staff member that submits or receives a report under the normal reporting channels must treat the matter confidentially (see Section 8).

If you do not feel comfortable speaking to your Manager - you can speak directly to the relevant support area.

Type of Concern	Support Area
<b>Fraud</b>	If fraud or financial crime is involved, then report your concern via the Intranet to <a href="#">Financial Crime Management</a> .
<b>Staff matters</b>	Westpac Group's people function, People Connect, or in New Zealand, the staff member's People Consultant for any Wrongdoing relating to people matters.
<b>Compliance</b>	Your Division's Head of Compliance for Wrongdoing related to compliance matters.
<b>Health &amp; Safety issue</b>	Report your concern through Safe + Sound, injury, hazard or near miss Online <a href="#">form</a> .

Reports of Wrongdoing raised through normal reporting channels may be investigated using the Westpac Group's Grievance or Incident Management Policy and Procedures.

## 6.2 Concern Online

Staff reporting Wrongdoing via normal channels can be assured they will be protected and that the investigation will be conducted in accordance with the principles of fairness and natural justice. However, the Westpac Group recognises that staff may prefer to bypass normal reporting channels in certain circumstances, including but not limited to, the following.

- They believe that they may be victimised if they use a normal reporting channel.
- They prefer to make the report anonymously.

Westpac has established [Concern Online](#) – an internal Intranet investigation/reporting system where Wrongdoing can be reported on an identified or anonymous basis. A link to Concern Online is available from the Westpac Group intranet homepage.

## 6.3 Malicious Reports

A staff member should only make a report if they are genuine in their concern, have reasonable grounds for believing there has been Wrongdoing and it is made in good faith.

Reports of Wrongdoing that are not made in good faith may result in Disciplinary Action.

## 6.4 Reporting to Regulators

This Policy does not prevent a staff member from reporting Wrongdoing to a regulator under an applicable law or prudential standard.

# 7. Investigating Wrongdoing

## 7.1 Overview

Reports of Wrongdoing will be recorded and investigated. The investigation will be conducted in a manner that is confidential, fair and objective. See the Whistleblower Investigator Guidelines for

Concern Online investigations for further information.

For a report to be investigated, it must contain sufficient information to form a reasonable basis for investigation. A staff member reporting anonymously should provide as much information as possible so as not to compromise the ability to assign an appropriate Whistleblower Investigator or to fully investigate the report.

## 7.2 Risk Assessment

Whenever a Manager or Whistleblower Investigator receives a report of Wrongdoing, they must consider the possibility that the Whistleblower may suffer some form of reprisal as a result of their actions.

It is the responsibility of the Manager or Whistleblower Investigator to assess the actual and reasonably perceived risk of victimisation or unlawful discrimination. See the Wellbeing Risk Assessment Guidelines for further information.

## 7.3 Assigning a Whistleblower Investigator

The Whistleblower Investigator will be an independent staff member who is not implicated directly or indirectly in the report. The Whistleblower Investigator will only be assigned to Wrongdoing reports received via Concern Online.

Enterprise Compliance is responsible for receiving and acknowledging reports submitted through Concern Online and assigning the matter to a Whistleblower Investigator.

Depending on the nature of the Wrongdoing and the person alleged to have been involved, Enterprise Compliance may recommend that an external party lead or take part in the investigation. The Chief Compliance Officer must approve the use of an external party.

## 7.4 Investigating the Wrongdoing

The Whistleblower Investigator will conduct an investigation to determine whether Wrongdoing occurred or was about to occur. The investigation processes will vary depending on the nature of the Wrongdoing and the amount of information provided.

If necessary to meet legal, regulatory or other requirements, the Whistleblower Investigator will request written consent from the Whistleblower to disclose the Whistleblower's identity and the information in the report before investigating the Wrongdoing.

The Whistleblower Investigator will notify Enterprise Compliance of the outcome of the investigation and any disciplinary actions. This will be recorded on Concern Online. Westpac's Incident Management Policy and Grievance Policy may apply in cases of Wrongdoing made via Concern Online.

## 7.5 Accounting and auditing issues

Matters that could have a material impact on the Westpac Group's financial position, reputation or regulatory compliance, such as matters relating to accounting, internal controls, compliance, or audit must be managed with priority as part of the Board Audit Committee's obligations under APRA

## 7.6 Feedback to the Whistleblower

Any Westpac staff member (excluding consultants and contractors) who reports Wrongdoing is entitled to receive feedback, subject to the privacy and confidentiality rights of those whom the reports are made against and subject to any requirement for confidentiality arising for Westpac. A contractor or consultant will only receive feedback after the contractor or consultant agrees in writing to protect and maintain confidentiality of any information provided by Westpac.

A Whistleblower will always be informed of the outcome of the investigation. In cases where the Whistleblower Investigator has not substantiated the allegations, an appropriate explanation will be made to the Whistleblower, subject to any privacy and confidentiality rights or requirements as outlined above.

## 8. Protections and rights

### 8.1 Confidentiality

To the extent possible, staff must protect and maintain confidentiality of reports and information submitted or received through normal channels or Concern Online.

Failure to maintain confidentiality may be subject to disciplinary action or civil and/or criminal penalties.

A staff member who receives a report of Wrongdoing must obtain consent from the Whistleblower to disclose the Whistleblower's identity to other parties including the Chief Compliance Officer, Company Officers and risk or audit committees. Consent should always be in writing. Verbal consent is acceptable but should only be used when it is impractical to obtain written consent due to illness, extended absence or urgency or some other similarly significant reason.

The identity of the Whistleblower must not be disclosed unless one of the following applies.

- ✓ The Whistleblower consents to disclosure.
- ✓ Disclosure is required by law or a matter of procedural fairness or natural justice.
- ✓ Disclosure is necessary to prevent or lessen a serious threat to a person's health, safety or welfare.
- ✓ It is necessary to protect or enforce the Westpac Group's legal rights or interests, or to defend any claims.

The Whistleblower should be aware that while every attempt to protect confidentiality will be made there may be occasions when their identity will become known to others or disclosures of their identity may be required by law.

In protecting the Whistleblower's confidentiality, the details of their complaint, the investigation and related decisions will be classified and stored securely.

### 8.2 Anonymous reports

Whistleblowers can report their concerns anonymously.

If the Whistleblower decides to report anonymously, they need to provide sufficient evidence for the matter to be investigated, as it may not be possible to ask the Whistleblower for clarification. Also it may not be possible to keep the Whistleblower informed of the investigation's progress. The Whistleblower may also have difficulties relying upon statutory legal protections (see section 8.5)

If a Whistleblower makes an anonymous report and provides enough information, Westpac is committed to investigating their concern. Westpac will not investigate where insufficient information has been provided.

### 8.3 Immunity from Disciplinary Action

A Whistleblower will be provided immunity from Disciplinary Action (related to the Whistleblower Complaint) provided the Whistleblower's report of Wrongdoing is made in good faith and the Whistleblower was not involved in the Wrongdoing.

If a Whistleblower is implicated in the Wrongdoing they are reporting, admitting involvement does not provide immunity from civil or criminal liability or disciplinary actions.

However, by blowing the whistle and being cooperative in the investigation process, such positive acts may be taken into account as mitigating factors when considering disciplinary or other actions that may be taken against the Whistleblower.

### 8.4 Protection against Victimization

Westpac takes very seriously any victimisation against a Whistleblower.

Victimisation is where you suffer some form of determinant such as bullying or harassment (see definitions section).

Westpac will take appropriate action, which may include legal proceedings or termination of employment or engagement with the Westpac Group, if a staff member is found to have victimised the Whistleblower or the Whistleblower's family or work colleagues as a result of reporting Wrongdoing in good faith.

Victimisation of Whistleblowers may also breach laws and result in civil and criminal penalties.

### 8.5 What kinds of Whistleblower reports get statutory protection?

While all reports are protected under this Policy, only certain kinds of reports are legally protected. Please consult Enterprise Compliance or Group Corporate Legal for information on statutory protections.

## 9. Whistleblower Protection Officer (WPO)

The Whistleblower Protection Officer is a senior Westpac staff member. The WPO is responsible for protecting the Whistleblower from being victimised as a result of making a report.



The CCO & Group General Counsel in consultation with the Group Executive, Human Resources & Corporate Affairs (or their delegates), is responsible for selecting the WPO. See the WPO Guidelines for further information.

The Whistleblower can seek advice from the Whistleblower Protection Officer prior to or after making a report. In addition, any staff member reporting Wrongdoing in good faith can request assistance from the Whistleblower Protection Officer.

The Whistleblower Protection Officer can protect the Whistleblower in a number of ways including, but not limited to, the following.

- ✓ Ensuring confidentiality in the investigation.
- ✓ Protecting, as far as legally possible, the staff member's identity.
- ✓ Offering a staff member leave of absence while a matter is investigated.
- ✓ Relocating the staff member or other staff to a different work group or department.

If the Whistleblower does not believe that the protections offered to them are adequate, they may ask the Whistleblower Protection Officer to refer the case to the Group Executive, Human Resources and Corporate Affairs for consideration.

If, despite the protections offered, the Whistleblower or their colleague(s) or relative(s) suffers victimisation as a result of the Whistleblowing, they should immediately contact the Whistleblower Protection Officer to discuss the action(s) that can be taken.

To maintain independence, the Whistleblower Protection Officer cannot be assigned as a Whistleblower Investigator.



## 10. Reporting

Enterprise Compliance will review the reports submitted through Concern Online and the investigation results.

On a quarterly basis reports on Concern Online are provided to the Board Risk & Compliance Committee (**BRCC**) and Group Risk and Compliance Committee (**RISKCO**). Matters are referred to the Board Audit Committee by the BRCC where relevant, e.g. any matters relating to accounting, internal control or audit concerns.

A report will be provided to the Board Audit Committee annually regarding staff awareness of the

Policy through the Doing The Right Thing Training Module. The Policy will also be provided to the Board Audit Committee when a new version has been approved by RISKCO.

## 11. Roles and responsibilities

The Westpac Board is responsible for reviewing and approving overall risk management strategy. The Board's approach is that responsibility and accountability for risk first begins with the Business Units that originate the risk.

### Westpac Board Audit Committee

- Review the policies and procedures that exist for the receipt, retention and treatment of information submitted confidentially by staff and third parties about accounting, internal controls, compliance, audit or other matters about which a staff has concerns, and monitor staff awareness of the policies and procedures.

### Group Risk & Compliance Committee (RISKCO)

- Whistleblower Policy approval from a management perspective.
- Approving material variations to the Whistleblower Policy.

### Chief Compliance Officer

- Approve all non-material variations to the Whistleblower Policy.
- Approve Policy exemptions.
- Approve external investigators (See part 7.3).
- Manage the WPO selection process as per the WPO Guidelines (see Part 9).
- Review Whistleblower concerns as required.

### Enterprise Compliance

- Receive and acknowledge reports submitted through Concern Online.
- Assign reports submitted through Concern Online to a Whistleblower Investigator.
- Review the reports of Wrongdoing submitted through the Concern Online and the investigation results.
- Obtain reports from the WPO as required.
- On a quarterly basis, provide the BRCC and RISKCO a summary of the reports received through Concern Online and investigation results. This report must de-identify whistleblowers.
- Maintain a current register of Group and regional Whistleblower Investigators (including training).
- Provide Whistleblower Investigator training as required.
- Approve Whistleblower Investigator's appointment.
- Provide Concern Online training as required.
- Provide WPO training as required.
- Review the Whistleblower Protection Officer Guidelines as required.
- Review the Whistleblower Investigator Guidelines as required.
- Review the Wellbeing Risk Assessment Guidelines as required.

## Specialised or Divisional Compliance

- Implement this Policy in their BU's.
- Include the Whistleblower process in BU Compliance Plans and ensure adequate controls are in place to meet and review the effectiveness of the BU Whistleblower process.
- Provide appropriate training to BU staff (as necessary).

## Whistleblower Investigator

- Investigate Wrongdoing reports received through Concern Online.
- Risk assessment of the Whistleblower's welfare and action as appropriate.
- Provide feedback to the Whistleblower through Concern Online.
- Update Concern Online with their investigation results in a timely manner.
- Maintain investigator training and competency.
- Advise Enterprise Compliance if they cease to be an investigator or change roles.

## Whistleblower Protection Officer

- Responsible for providing protection against victimisation to staff who are Whistleblowers.

## Board Risk and Compliance Committee

- Review reports on receipt and treatment of complaints received by the Westpac Group about accounting, internal control, audit, compliance or other matters about which staff have concerns.
- Refer to the Board Audit Committee any matters that have come to the attention of the Committee that are relevant to the Board Audit Committee.

## Group Executives

- Lead by example to create an organisational culture where reports of Wrongdoing are encouraged and corruption or maladministration is not accepted.

## Business Unit (BU)

- Include the Whistleblower process into their BU Compliance Plans and ensure adequate controls are in place to meet and review the effectiveness of the BU Whistleblower process.
- Provide appropriate training to all staff (as necessary).

## Managers/People Leaders

- Receive Wrongdoing reports.
- Investigate Wrongdoing reports or refer them to the appropriate person.
- Record Wrongdoing reports within Concern Online as appropriate.
- Risk assessment of the complainant's welfare and action as appropriate.
- Refer Whistleblowers to the WPO if required.
- Provide appropriate training to all staff (as necessary).

## Staff and Contractors

- Report actual, suspected or anticipated Wrongdoing.
- Make disclosures in good faith.
- Not disadvantage or victimise staff that make a disclosure.
- Undertake the Doing the Right Thing Training module within three months of commencing employment.
- Comply with this Policy, together with Business Unit standards and procedures.
- All Staff and Contractors must ensure that they are aware of their responsibilities in relation to this Policy and that all requirements of this Policy are met as it relates to their role.
- Comply with Westpac's Code of Conduct.

## Group Audit

- Provide independent assurance over the adequacy of controls over key risks and that those controls are operating effectively.

# 12. Policy governance

## 12.1 Policy Review

The Policy is reviewed three yearly and whenever there are significant regulatory changes or business needs.

No part of this Policy or its supporting procedures should be interpreted as contravening or superseding any other legal and regulatory requirements imposed upon the Westpac Group in any jurisdiction in which it operates. Any apparent conflicts between this Policy and Westpac Group's other legal obligations should be submitted immediately to the Chief Compliance Officer for further evaluation.

## 12.2 Consequences of non-compliance

Non-compliance with this Policy could have serious consequences for our business, including penalties, injunctions, customer loss and reputation damage. It is each person's responsibility to understand how this Policy applies to their function.

A breach of this Policy may, in some circumstances, result in Disciplinary Action.

## 12.3 More information

If you are uncertain about whether or how this Policy applies to you and your Business Unit, please speak to your immediate Manager, Specialised Compliance or Enterprise Compliance.

## 13. Definitions

<b>Term</b>	<b>Definition</b>
<b>Concern Online</b>	Westpac's internal Intranet investigation/reporting system that enables staff to report Wrongdoing either on an identified or anonymous basis. The staff member can also obtain further information and track any action taken with respect to their report.
<b>Disciplinary Action</b>	Includes but is not limited to, Formal Warnings, movement of staff, dismissal, demotion, or suspension of staff.
<b>In good faith</b>	A genuine belief not influenced by any intent to defraud, act maliciously or take unfair advantage.
<b>Obligations</b>	Includes the requirements set out in legislation, regulation, license conditions, regulatory Policy and guidelines, Group Code of Conduct and other internal policies and key industry association Codes of Conduct and other standards that the Group adopts.
<b>Victimisation</b>	Threaten with or discharge, demote, suspend, threaten, harass, or in any other manner discriminate against, disadvantage, or cause detriment to staff in the terms and conditions of employment.
<b>Westpac Group or Westpac</b>	Westpac Banking Corporation ABN 33 007 457 141 and its subsidiaries. Westpac Group also includes the divisions operated by Westpac Banking Corporation, including but not limited to St-George Bank, BankSA and Bank of Melbourne. For the purposes of this Policy, and any processes developed by a Business Unit to comply with this Policy, Westpac Group includes overseas branches and subsidiaries.
<b>Whistleblower</b>	Any Westpac staff member who, in good faith, voluntarily makes a report of any Wrongdoing of the kind described in the Policy whether using normal reporting channels set out in this Policy or Concern online.
<b>Whistleblower Investigator</b>	A person who has been approved by Enterprise Compliance and registered as a Whistleblower Investigator in Concern Online.
<b>Wrongdoing</b>	Any illegal conduct or any conduct listed in Section 5, or concealment of such conduct by a Westpac staff member

## 14. Westpac references

<b>Title</b>	<b>Description</b>
Code of Conduct	The Code describes the standards of conduct expected of Westpac's staff and contractors.
Grievance Policy	Westpac Policy for dealing with work grievances in a fair, consistent and timely way.
Incident Management Procedures & Guidance	The Operational Risk Incident Management (IM) Policy outlines the minimum requirements for managing incidents across the Westpac Group.
Fit & Proper Policy	Contains the CPS 520.44 (Whistleblowing requirements)
Our Principles for Doing	Describes Westpac's commitment in sustainable business practices and community

Business	involvement. (See Part 2.5, Whistleblowing)
Board Audit Committee Charter	The Board Audit Committee Charter includes responsibilities of the Committee relating to procedures for staff to confidentially report certain matters.
Whistleblower Policy (internet summary)	A brief summary of the Whistleblower Policy as part of Westpac's Corporate Governance Statement.
Fraud Investigation Guidelines	Explains how fraud is investigated and the investigation standard adopted across Westpac.

## 15. Laws, codes and regulations

Title	Description
Corporations Act 2001	Section 1317AA – disclosures qualifying for statutory protection.
Banking Act 1959	Section 52A – disclosures qualifying for statutory protection.
Insurance Act 1973	Section 38A – disclosures qualifying for statutory protection.
Life Insurance Act 1995	Section 156A – disclosures qualifying for statutory protection.
Superannuation Industry (Supervision) Act 1993	Section 336A – disclosures qualifying for statutory protection.
ASIC Information Sheet 0052	ASIC guide to understand who is a Whistleblower and what kinds of protections Whistleblowers may be entitled to under the Corporations Act.
AS 8004-2003	Australian Standard for establishing, implementing and managing an effective Whistleblower protection program.
APRA Prudential Standard CPS510 (Governance)	The Board Audit Committee must establish policies and procedures for staff to confidentially report certain matters. See CPS510.75
Sarbanes-Oxley Act 2002 (US)	The Board Audit Committee shall establish procedures for the confidential, anonymous submission of concerns regarding questionable accounting or auditing matters.
Dodd-Frank Act 2010 (US)	The new SEC whistleblower program, implemented under Section 922 of the Dodd-Frank Act, is primarily intended to reward individuals who act early to expose violations and who provide significant evidence that helps the SEC. bring successful cases.

# Whistleblower Protection Policy

## 1. Overview

The Whistleblower Protection Policy (**the Policy**) is one of a number of Policies and Codes that promotes a culture of compliance, honesty and ethical behavior within the Westpac Group.

Westpac's aim is to encourage staff to report any Wrongdoing in good faith and in an environment free from victimisation so that the Board and Senior Management can adequately manage risk and cultural issues within Westpac.

## 2. Commitment

Westpac's Senior Management encourages all staff to report Wrongdoing. Westpac's attitude is - "*when in doubt report*". All staff should feel confident and comfortable about reporting wrongdoing.

Westpac's Senior Management is committed to protecting and supporting the dignity, wellbeing, career and good name of anyone reporting Wrongdoing.

## 3. Scope

The Policy applies to all staff, including Westpac Directors, Managers, staff, secondees, contractors and consultants in all businesses and subsidiaries (including all offshore locations) within the Westpac Group.

It sets out the minimum requirements for the Westpac Group. Where Westpac operates in an overseas jurisdiction and that overseas jurisdiction imposes a higher standard, those local standards are deemed to be incorporated into and to supplement the Policy.

## 4. What is "Wrongdoing"?

Examples of Wrongdoing include, but are not limited to, the following:

- a breach of regulations or laws;
- a breach of Westpac's Policies and Codes;
- dishonest or corrupt behavior, including soliciting, accepting or offering a bribe, facilitation payments or other such benefits;
- fraudulent activity;
- illegal activity (including theft, drug sale / use, violence or threatened violence and property damage);
- impeding internal or external audit processes;
- improper behavior relating to accounting, internal accounting controls, actuarial, or audit matters;
- an activity that poses a substantial risk to the environment;
- a serious impropriety;
- conduct endangering health or safety;
- a substantial mismanagement of Westpac's resources;
- conduct that is detrimental to Westpac's financial position or reputation; and
- concealment of Wrongdoing.

## 5. Reporting Wrongdoing

A staff member can report Wrongdoing in two ways:

1. Direct Line of Management
2. Concern Online.

### 1. Direct Line of Management

Depending on the nature of the Wrongdoing, the staff member is encouraged to first discuss their concern with their Manager.

Any staff member that submits or receives a report must treat the matter confidentially.

If the staff member does not feel comfortable speaking with their Manager, they can raise a Wrongdoing with the support area within Westpac relevant to their concern:

TYPE OF CONCERN	SUPPORT AREA
Fraud or financial crime	Financial Crime Management
Staff or people matters	Westpac Group's people function, People Connect or, in New Zealand, the staff member's People Consultant
Compliance	The Division's Head of Compliance
Health & Safety issue	Safe + Sound, the intranet based system for reporting an injury, hazard or near miss

Reports of Wrongdoing raised through these channels may be investigated using the Westpac Group's Grievance or Incident Management Policy and Procedures.

Staff reporting Wrongdoing via these channels can be assured they will be protected and that the investigation will be conducted in accordance with the principles of fairness and natural justice.

The Policy does not prevent a staff member from reporting Wrongdoing to a regulator under an applicable law or prudential standard.

### 2. Concern Online

The Westpac Group also recognises that staff may prefer to bypass their Direct Line of Management in certain circumstances, including but not limited to, the following.

- they believe they may be victimised if they use a normal reporting channel; or
- they prefer to make the report anonymously.

To ensure these staff can raise a Wrongdoing, Westpac established **Concern Online**. **Concern Online** is an intranet-based investigation and reporting system where Wrongdoing can be reported on an identified or anonymous basis.



## 6. Investigating Wrongdoing

Investigations of Wrongdoing will be conducted in a manner that is confidential, fair and objective. The investigation processes will vary depending on the nature of the Wrongdoing and the amount of information provided.

For a report to be investigated, it must contain sufficient information to form a reasonable basis for investigation. A staff member reporting anonymously, via Concern Online, should provide as much information as possible so as not to compromise the ability to fully investigate the report

A Whistleblower will always be informed of the outcome of the investigation. In cases where the Whistleblower Investigator has not substantiated the allegations, an appropriate explanation will be made to the Whistleblower, subject to any privacy and confidentiality rights.

## 7. Whistleblower Protection Officer (WPO)

Westpac's Policy provides for the appointment of the Whistleblower Protection Officer (WPO). The WPO is responsible for protecting the Whistleblower from being victimised as a result of making a report.

Any staff member reporting Wrongdoing can seek advice from the Whistleblower Protection Officer prior to or after making a report.

The Whistleblower Protection Officer can protect the Whistleblower in a number of ways including, but not limited to, the following.

- ✓ Ensuring confidentiality in the investigation.
- ✓ Protecting, as far as legally possible, the staff member's identity.
- ✓ Offering a staff member leave of absence while a matter is investigated.
- ✓ Relocating the staff member or other staff to a different work group or department.

## 8. Reporting & Governance

Enterprise Compliance reviews the reports submitted through Concern Online and the investigation results. Reports on Concern Online are also provided regularly to the Board Risk & Compliance Committee (**BRCC**) and Group Risk Committee (**RISKCO**). Matters are referred to the Board Audit Committee by the BRCC where relevant, e.g. any matters relating to accounting, internal control or audit concerns.

The Policy is reviewed regularly and whenever there are significant regulatory changes or business needs.

A breach of the Policy may, in some circumstances, result in Disciplinary Action.