

Commonwealth Bank



Commonwealth Life



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Commonwealth Bank of Australia

Group Whistleblower Policy

Group Security and Advisory
Financial Services



**COMMONWEALTH BANK OF AUSTRALIA
GROUP WHISTLEBLOWER POLICY**

DOCUMENT CONTROL

Revision History

Version	Author	Issue Date	Changes
1.2		December 2010	Reviewed against Group Risk Appetite Statement V2.0 October 2010
2.0		October 2012	Reviewed against Group Risk Appetite Statement V3.0 October 2012
2.1		April 2013	Renamed Policy from Group Reporting Fraud and Unethical Behaviour Policy to Group Whistleblower Protection Policy Minor content changes to reflect the Policy/ Program Name change
3.0		June 2014	Policy updated post independent review; includes updates to roles and responsibilities
3.1		November 2015	Annual review
4.0		February 2017	Policy updated to reflect the ABA Guiding Principles issued in December 2016. Renamed Policy from Group Whistleblower Protection Policy to Group Whistleblower Policy.

Approval Authority

Version	Date	Approval Body or Person
3.0	June 2014	EGM Group Security
3.1	December 2015	EGM Group Security and Advisory
4.0	March 2017	Executive Committee and CBA Board of Directors

COMMONWEALTH BANK OF AUSTRALIA GROUP WHISTLEBLOWER POLICY

1. CONTEXT

- 1.1 The Commonwealth Bank Group (the Group) is committed to maintaining an ethical work environment and an organisational culture that does not tolerate any act which constitutes 'reportable conduct' as defined by section 4 of this policy. In order to foster a sound ethical culture throughout the organisation, the Group encourages anyone who has knowledge of, or reasonable suspicions of, any incident of reportable conduct to report the matter through the appropriate channels, as set out in section 6 of this policy, at their earliest opportunity.
- 1.2 An effective whistleblower protection program is an important element in detecting illegal, corrupt or other undesirable conduct within the Group, and as such, is a necessary element in achieving a culture of ethical behaviour and strong corporate governance.
- 1.3 An effective whistleblower program can result in:
- more effective compliance with relevant laws;
 - more effective management;
 - identification of problems in a business;
 - improved business practices;
 - reduction of business risks;
 - improved morale within the Group;
 - the protection of the interests of customers; and
 - demonstration that the Group is taking its governance obligations seriously.
- 1.4 Often those making disclosures of this nature are concerned with the confidentiality of the disclosure, the manner in which the disclosures are dealt with, and potential repercussions arising from making such a disclosure. This policy seeks to ensure that those making a disclosure can trust that:
- (a) the matter will be dealt with honestly, professionally and, where appropriate, confidentially; and
- (b) they will not be subject to retaliation, as a result of making a disclosure.
- 1.5 For the purpose of this policy, an Eligible Person is defined as a:
- director, manager, employee, licensee (or its authorised representative or their employee), secondee;
 - contractor, consultant, supplier, service provider (or their employee);
 - broker, auditor; or
 - former employee,
- of the Group.
- 1.6 For the purpose of this policy, a whistleblower is defined as an Eligible Person, who:
- (a) makes, attempts to make or wishes to make a report of reportable conduct; and
- (b) requests the protections for whistleblowers set out in this policy (or who the Group otherwise determines is a whistleblower and should be protected as a result of making a report). Under the provisions of certain legislation, other parties may be considered and protected as whistleblowers.

2. PURPOSE AND OBJECTIVE

2.1 The purpose of this policy is to:

- encourage and support the reporting of reportable conduct and define what constitutes reportable conduct;
- identify who is deemed to be a whistleblower;
- explain how the identity of a whistleblower will be protected;
- explain how a whistleblower will be supported and protected from any retaliation as a result of making a disclosure of reportable conduct;
- explain the whistleblower reporting process and how reports are assessed and investigated;
- explain the roles of specific appointments for the investigation of reportable conduct and the protection and support of whistleblowers; and
- detail the requirements surrounding governance of this Policy and process.

2.2 The objective of this policy is to encourage and support the reporting of reportable conduct by providing assurance to the whistleblower that it is safe for them to do so. The Group is committed to identifying and responding to disclosures of reportable conduct and fostering a culture of speaking up about problems and business risk so the Group can continually improve the way it conducts its business. The Board and senior management encourage all Eligible Persons to report conduct that they believe could be reportable under this policy.

2.3 This policy should be read in conjunction with the Group's policies and procedures, including "Our Commitments". This policy may be subject to change from time to time at the Group's discretion. It does not form part of any employee's contract of employment or any industrial instrument that may apply.

3. SCOPE

3.1 This policy applies to all businesses within the Group, including subsidiaries where the Group has a controlling interest and is applicable to all Eligible Persons of those businesses.

3.2 This policy must be implemented in accordance with the laws of the relevant jurisdiction. Where local jurisdictional requirements are more stringent than those contained in this policy, those requirements will apply to the extent of any inconsistency with this policy.

3.3 Entities whose whistleblower management and reporting is not conducted through Group Security and Advisory, are to adhere to the principles of this policy and are to provide periodic reporting on whistleblower matters as agreed with Group Security and Advisory.

4. REPORTABLE CONDUCT

4.1 For the purpose of this policy, reportable conduct is defined as any conduct which is:

- Dishonest
- Fraudulent
- Corrupt
- Illegal
- In breach of legislation

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- In serious breach of internal policy
- Unethical
- Improper
- Bullying and harassment
- Unsafe work practices
- Any other conduct which may cause financial or non-financial loss to the Group or be otherwise detrimental to the interests of the Group and its customers, including environmentally unsound practices.

4.2 Additional specific instances where the disclosure of information by a person will qualify for protection are detailed in sections 9 and 10 below.

5. THE WHISTLEBLOWER

5.1 A whistleblower may or may not wish to remain anonymous. Where a whistleblower wishes to remain anonymous, this will be respected. Such a whistleblower is to be informed that, by their nature, anonymous reports are more difficult to investigate, and it may prevent the whistleblower from accessing additional protection to which the whistleblower may be entitled under legislation as detailed in section 9 below.

5.2 A whistleblower who, the Group determines, has made a disclosure of reportable conduct, will be protected from retaliation, as a direct result of having made the disclosure. This includes, but is not limited to:

- termination of employment;
- disciplinary action including warnings;
- performance management;
- harassment or bullying;
- discrimination; or
- any other conduct that constitutes retaliation.

5.3 However, nothing in this policy impacts the Group's ability to deal with an Eligible Person in relation to matters arising in the ordinary course of their relationship and contractual duties with the Group (for example, separate performance or misconduct concerns).

5.4 The Group will not be able to provide the same level of protection and support for a whistleblower who is an external third party or former employee, at the time the disclosure is made.

5.5 The Group will appoint an appropriately qualified and suitable person to be a Whistleblower Protection Officer (WPO) who will seek to ensure that the whistleblower is protected and supported within the context of this policy and any relevant legislation. Once a disclosure of reportable conduct has been made, the whistleblower will be provided with the WPO's details and will have access to the WPO at any time.

5.6 It is not acceptable to retaliate against or victimise a whistleblower (or threaten to do so) as a result of their making a disclosure of reportable conduct. This will not be tolerated by the Group under any circumstances. Any employee who is found to have retaliated against a whistleblower will be liable to disciplinary action, including potential termination of employment.

5.7 If a whistleblower considers themselves "at significant risk" of retaliation as a result of making a disclosure, they may request that positive action be taken in relation to their

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protection. Such action could include, but is not limited to, a request to be allowed to take leave or to be relocated for the duration of the investigation. The whistleblower must advise the WPO if they wish specific actions to be considered and the WPO will liaise with appropriate management staff to determine the feasibility of the request. Wherever possible, such requests will be met or the whistleblower will be provided with an explanation as to the reason(s) it is not possible. The WPO may be limited in their ability to provide protection if the whistleblower does not consent to be identified.

6. THE WHISTLEBLOWER PROCESS

- 6.1 Disclosures of reportable conduct must be based on information that is directly known to the person making the disclosure. That person must have reasonable grounds to suspect the alleged conduct has occurred.
- 6.2 Eligible Persons with information in relation to any reportable conduct have the option of reporting the issue via:
- A senior leader, at or above General Manager level within the Group;
 - The Group's SpeakUP program:
 - 1800 773 258 (a 24-hour hotline dedicated for reporting suspicions);
 - Reverse charge from overseas on +61 2 8295 2944
 - Email to speakup@speakuphotline.com.au
- 6.3 SpeakUP is a 24/7 dedicated service for people to raise issues impacting their role, their wellbeing at work, or the Group, including reportable conduct. Those contacting SpeakUP can choose to do so in confidence, anonymously, and/or avail themselves of the protections available under this policy. The SpeakUP service is managed by an external vendor on behalf of the Group.
- 6.4 On receipt of a disclosure, the person receiving it must ask the whistleblower whether he or she consents to the disclosure and/or their identity being shared with appropriate persons (e.g. within Group Security and Advisory, Group People Services or Group Legal), the WPO and, if appropriate, to a Whistleblower Investigation Officer (WIO). This can enable the disclosure to be investigated properly and the whistleblower to be protected and supported as contemplated by this policy. The whistleblower should be informed that if such consent is not given, there may be limitations on investigating the disclosure further and on the Group's ability to protect them (for example, if the WPO cannot be contacted). If the whistleblower does consent, the disclosure should be reported immediately to Group Security and Advisory. If the whistleblower has concerns about the disclosure being disclosed to Group Security and Advisory because the issues relate to a person in Group Security and Advisory, the provisions outlined in paragraph 6.16 are to be followed.
- 6.5 All disclosures of reportable conduct made via SpeakUP will normally be managed by Group Security and Advisory, in accordance with its standard operating procedures relating to whistleblowing matters. All SpeakUP and Group Security and Advisory staff responsible for receiving and assessing disclosures are to be trained on the contents of this policy.
- 6.6 Once a disclosure has been received by Group Security and Advisory and assessed as to whether further investigation is appropriate, the matter will be referred to a WIO. The WIO will be responsible for investigating the substance of the reported disclosure and for keeping the whistleblower apprised of the investigation's progress.

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The whistleblower will be informed of the WIO's appointment and the WIO will contact the whistleblower to acknowledge receipt of the disclosure and to establish a process, including expected timeframes, for reporting to the whistleblower on the progress of dealing with the disclosure.

- 6.7 If the whistleblower is not an employee, the Group is limited in the protections (including against retaliation) that can be provided to the whistleblower. The WIO will inform the whistleblower that the terms of this policy will apply to the extent applicable. The WIO will also request that the whistleblower maintain confidentiality in relation to any information provided to him or her in relation to any report provided by the WIO.
- 6.8 The whistleblower will be contacted by the WPO, as soon as practicable after the matter has been referred to a WIO, to discuss their welfare and to discuss a communication process, if required.
- 6.9 If it is determined that there is insufficient information or evidence to warrant further investigation, the whistleblower will be informed at the earliest possible opportunity. No further action will be taken.
- 6.10 Where a formal investigation is initiated, this will be a fair and independent process, without bias, and conducted by the WIO or their delegate. Investigations will be independent of the business unit in respect of which allegations have been made, the person who has made the disclosure, or any person who is the subject of the reportable conduct.
- 6.11 A person against whom allegations have been made will be informed of the substance of any allegation, except to the extent that doing so may identify the whistleblower or the content of the disclosure (in circumstances where the whistleblower has not given consent for that to occur). The person will also have the right to respond to any allegation.
- 6.12 The WIO may engage external investigators to assist in an investigation into a disclosure of reportable conduct, where appropriate. For the avoidance of doubt, the WIO may not disclose to an external investigator any information disclosed by the whistleblower or their identity unless the whistleblower has consented to this.
- 6.13 At the end of an investigation, the investigator will make factual findings on any allegations raised. Findings will be made on the balance of probabilities based on verifiable evidence. The whistleblower will be informed by the WIO of the final outcome of the investigation, where appropriate. The potential outcomes to be communicated are:
 - Substantiated and appropriate action has been taken; or
 - Disproven and no further action will be taken unless further evidence to the contrary becomes available; or
 - Unable to be substantiated and no further action will be taken unless further evidence becomes available.
- 6.14 Where investigations substantiate an allegation arising from the disclosure, the matter will be dealt with in accordance with established administrative or disciplinary procedures, which may result in disciplinary action, including termination of employment.
- 6.15 Any matters of a criminal nature will be reported to the Police and, if appropriate, other appropriate regulatory authorities.

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- 6.16 If a person who makes a disclosure considers that their disclosure has not been dealt with in accordance with this policy, they have been subject to retaliation as a result of making the disclosure or if the disclosure affects someone in Group Security and Advisory, the matter can be escalated to the WPO. The whistleblower can also appeal to the Misconduct Governance Committee, if the matter is not resolved by the WPO.

7. CONFIDENTIALITY & IMMUNITY

- 7.1 The Group is committed to protecting and respecting whistleblowers who disclose reportable conduct in accordance with this policy.
- 7.2 The Group is committed to protecting the anonymity or confidentiality of a whistleblower where that person has specifically requested that protection. It is important to note however, that in certain circumstances, the Group may be compelled by law to disclose the whistleblower's identity, for example in legal proceedings.
- 7.3 Disclosures to SpeakUP may be made anonymously or confidentially by phone or email.
- 7.4 Nothing in this policy should be interpreted as restricting a whistleblower from raising issues or providing information to a regulator in accordance with any relevant law, regulation or prudential standard. The Group acknowledges that the whistleblower may communicate with regulators at any time in relation to the subject matter of the disclosure.
- 7.5 Should the whistleblower elect to remain anonymous when making the disclosure via SpeakUP, they will be provided with a unique reference number. In the event that the whistleblower wishes to provide further information regarding the disclosure, they should contact SpeakUP and quote the reference number. Should the whistleblower have any concerns about their protection, they should contact the WPO.
- 7.6 All information received from a whistleblower in relation to a disclosure of reportable conduct, or that could lead to the identification of the whistleblower, is to be held securely and in the strictest confidence and must not be disclosed unless:
- the whistleblower has consented (preferably in writing) to the disclosure prior to such a disclosure; or
 - the Group is compelled by law to do so; or
 - the Group deems it appropriate to make a disclosure to a regulator under specific legislation (see Appendix 1 for details).

Any breach of confidentiality of the information provided by a whistleblower, or a whistleblower's identity, will be subject to a separate investigation and, if an employee is found to have disclosed the information, they may be liable to disciplinary action.

- 7.7 In circumstances where the WPO or WIO has genuine and reasonable concern about the immediate well-being or safety of the whistleblower or any member of the team investigating the whistleblower's disclosure, they may provide the person with details of the Group's Employee Assistance Program and may engage appropriate medical, counselling or support services on their behalf.

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- 7.8 If a member of the team investigating the whistleblower's disclosures believes they have been disadvantaged as a result of being involved in such investigation, they may contact the WPO who will investigate the matter.
- 7.9 The Group may, at its discretion, grant a whistleblower, who has not himself or herself been engaged in serious or unlawful conduct, immunity from disciplinary proceedings relating to matters that may come to light as a result of their disclosure. However, whistleblowers must continue to adhere to their obligations to the Group, including any relevant policies in relation to the security and privacy of Group information, at all times. Nothing in this policy impacts the Group's ability to deal with an Eligible Person in relation to matters arising in the ordinary course of their e relationship (for example, separate performance or misconduct concerns).
- 7.10 The Group cannot grant any person immunity against criminal prosecution or third party legal proceedings. Immunity against prosecution can only be granted, in most jurisdictions, by the relevant Director of Public Prosecutions or other prosecuting authority.
- 7.11 Where investigations show that the disclosure is disproven, all matters relating to the conduct and the results of the investigation will remain confidential.

8. ROLES AND RESPONSIBILITIES

- 8.1 There are four principal specific roles with responsibilities to investigate reportable conduct and to protect and support whistleblowers:
 - Whistleblower Protection Officer (WPO)
 - Whistleblower Investigation Officer (WIO)
 - Whistleblower Reporting Officer (WRO)
 - SpeakUP Manager
- 8.2 Except in exceptional circumstances in order to protect the whistleblower, a person who is appointed a WPO cannot be appointed a WIO in relation to the same matter. WPO and WIO are separate roles with distinct responsibilities and which, except in exceptional circumstances, operate independently of each other.
- 8.3 The designated roles and responsibilities of the WPO, WIO, WRO and SpeakUP Manager are detailed below:

Role Title	Key Role Responsibilities	Performed By
Executive Champion of the Whistleblower Program	<ul style="list-style-type: none"> • The Misconduct Governance Committee will champion the whistleblower program and oversee the implementation and effectiveness of the program. • The individuals who form the Committee include: <ul style="list-style-type: none"> ○ Group Executive Financial Services ○ Group General Counsel and Group Executive Group Corporate Affairs ○ Group Chief Risk Officer 	Members of the Misconduct Governance Committee.

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Role Title	Key Role Responsibilities	Performed By
	<ul style="list-style-type: none"> ○ Group Executive Human Resources 	
Whistleblower Protection Officer (WPO)	<ul style="list-style-type: none"> • Ensure the well-being and protection of the whistleblower. • Maintain the strictest confidentiality of the whistleblower (if requested to do so). • Investigate (or coordinate the investigation of) any complaints of harassment or mal-treatment of: <ul style="list-style-type: none"> (i) a whistleblower protected under this policy; or (ii) a member of the team investigating a whistleblower's disclosure. 	A senior executive, currently EGM, Group Corporate Affairs, or their delegate from time to time.
Whistleblower Investigation Officer (WIO)	<ul style="list-style-type: none"> • Conducting whistleblower related investigations to investigate the substance of the disclosure to determine whether there is evidence in support of the matters raised or alternatively to refute the report made. • Where the WIO considers it appropriate, coordinating external investigators to conduct whistleblower related investigations. • Provision of feedback to the whistleblower on the progress and outcome of the investigation in accordance with this policy. 	<p>Senior staff within the Group who receive whistleblower reports for investigation.</p> <p>The allocation of reported matters to the relevant WIO is determined through the assessment and triage process.</p> <p>Those assigned to perform the WIO role include:</p> <ul style="list-style-type: none"> • Executive Manager, Group Investigations, Group Security and Advisory • Executive Manager, Workplace Relations • Group Legal Services • Line Management (as applicable) <p>The WIO may involve other staff members to assist in the investigation, subject to the whistleblower's consent.</p>
Whistleblower Reporting Officer (WRO)	<ul style="list-style-type: none"> • Overseeing the SpeakUP program and triage/assessment of whistleblower matters. • Overseeing Group Security and Advisory's whistleblower Board and Risk Committee reporting requirements. • Overseeing management of a secured central repository for recording of whistleblower reports. 	General Manager, Group Fraud Management Services, Group Security and Advisory.

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Role Title	Key Role Responsibilities	Performed By
Speak Up Manager	<ul style="list-style-type: none"> • Management of the Group's SpeakUP program. • Co-ordination of a whistleblower training program for relevant internal staff and relevant service providers. • Policy reviews and renewal. • Monitor and assess the effectiveness of the whistleblower service. 	SpeakUP Manager, Group Security and Advisory.

9. PROTECTION UNDER LEGISLATION

- 9.1 Various Australian legislation provides protection for certain disclosures by persons who make them in accordance with the provisions of the relevant legislation. These protections are designed to encourage people to disclose unlawful, improper or unethical behaviour to relevant parties.
- 9.2 To be protected under specific legislation, the person making the disclosure must make the disclosure in accordance with the provisions of the legislation.
- 9.3 Disclosures must be treated confidentially, to the extent possible under law (see paragraph 7.2). Some legislation allows the Group to disclose the information provided and the whistleblower's identity to relevant regulators or law enforcement.
- 9.4 In jurisdictions outside Australia, requirements of any local legislation relating to the protection of whistleblowers must be adhered to as appropriate.
- 9.5 A summary of relevant Australian legislation can be found at Appendix 1.

10. REPORTING OF FITNESS AND PROPRIETY CONCERNS

- 10.1 The Australian Prudential Regulation Authority (APRA) sets prudential standards that include the standards on 'fitness and propriety' of 'responsible persons'.
- 10.2 The Group's Fit and Proper policy, which complies with APRA's prudential standards on fitness and propriety, also includes provisions to ensure protection for persons to disclose information if they believe a person does not meet the relevant 'fit and proper' criteria for a 'responsible person' position, or if they believe the regulated institution has not complied with APRA's Prudential Standards on fitness and propriety. For further information, refer to the Group Fit and Proper Policy.
- 10.3 Where a person believes that a responsible person is not 'fit and proper', the belief and reasons for it should be reported in accordance with section 6 of this policy. Alternatively, the disclosure can be made directly to the Governance function¹ that performs the 'fit and proper' assessment; the CEO or Managing Director (as applicable) of the regulated company; the relevant Board (through the company secretaries); or to APRA directly. Any disclosures received may also be escalated to any of the persons or areas mentioned in this paragraph.

¹ The Governance function for all responsible persons within the Bank is Group Governance, and for Insurance Companies and Registrable Superannuation Entity licensees, it is Wealth Risk Management.

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10.4 Disclosures will be treated confidentially by the Group to the extent possible under law, and with integrity.

11. GOVERNANCE

11.1 Group Security and Advisory is responsible for the maintenance of this policy and for assuring that all divisions/business units adhere to the provisions contained herein. In order to ensure the policy remains effective and relevant, Group Security and Advisory will conduct a full policy review at least annually.

11.2 The policy (as amended from time to time) will be approved and endorsed by the Group’s Board of Directors and by the Executive Committee (ExCo). Any updated policy will be placed on the Group’s intranet and a summary of the policy will also appear on the Group’s website.

11.3 The Misconduct Governance Committee is responsible and accountable for the implementation and effectiveness of the whistleblower program.

11.4 The WRO will provide regular reports to the Board and the Misconduct Governance Committee on the effectiveness of this policy and, as appropriate, any material incidents and the status of any ongoing investigations.

12. RESPONSIBILITIES AND ACCOUNTABILITIES

12.1 The table below summarises the responsibilities and accountabilities in relation to this policy:

	All Staff	EGM, Group Security and Advisory	Group Security and Advisory	Misconduct Governance Committee	Group Legal Counsel	SpeakUP Manager	WRO	WPO	WIO
Disclosing reportable conduct	R/A								
Protection of whistleblower		C			C			R/A	
Investigating allegations of harassment/discrimination		I			C			R/A	
Management of SpeakUP program	I	A		C	C	R		C	C
Training of personnel who receive hotline calls						R/A			I
Investigation of whistleblower matters		I				I	I	I	R/A
Providing whistleblower with progress reports, and outcomes						I		I	R/A
Reporting issues to Police or regulatory authorities		C			I		I	I	R/A
Maintaining confidentiality of whistleblower information		A		R	R	R	R	R	R
Secure storage/handling of whistleblower information		A		R	R	R	R	R	R
Protecting rights of subject of a whistleblower report								R/A	

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Assurance of whistleblower program effectiveness		R		A		R	I		
Training of staff involved in whistleblower investigations		A		I		R			R/A
Assessment and triage of whistleblower disclosures		I	R				A	I	I
Management of central repository of whistleblower information						I	R/A		
Preparation of Board/ Risk Committee/Audit Committee reports (as appropriate)		A					R		
Policy review and compliance			R/A	I	C	R	C	C	C

R = Responsible; A = Accountable; C = Consulted; I = Informed

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Appendix 1

		Banking Act 1959	Corporations Act 2001	Life Insurance Act 1995	Insurance Act 1973	Superannuation Industry Supervision Act 1993
Who can report a matter to the company?	<p>a) An officer of the company; b) An employee of the company; c) A person who has a contract for the supply of services or goods to the company or an employee of a contractor.</p> <p>In the case of a disclosure in relation to a superannuation fund, you can report a matter if you are (in addition to the persons described in paragraphs a) to c) above);</p> <p>1) A trustee of the superannuation entity or an employee of the superannuation entity; or 2) An officer or employee of a body corporate that is a trustee, custodian or investment manager of the superannuation entity.</p>	s 52A	s 1317AA	s 156A(1)	s 38A	s 336A
Who can I report a matter to and receive Whistleblower protection?	<p>a) APRA; b) An auditor of the company or a member of the audit team conducting an audit of the company; c) The appointed actuary, or in the case of a general insurer, an actuary²; d) A director or senior manager of the company; e) In the case of a superannuation entity, an individual who is a trustee or a director of a body corporate that is a trustee; f) A person authorised by the company to receive disclosures of this kind (e.g. Group Security and Advisory, SpeakUP, a senior leader at or above GM level).</p> <p>In the case of a disclosure you are making under the Corporations Act, then you may disclose information to ASIC.</p>	s 52A	s 1317AA	s 156A(2)(a)	s 38A(2)(a)	s 336A

² Note that an actuary or appointed actuary is not a prescribed person for the purposes of the Banking Act 1959

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		Banking Act 1959	Corporations Act 2001	Life Insurance Act 1995	Insurance Act 1973	Superannuation Industry Supervision Act 1993
What do I need to do to qualify for Statutory Whistleblower protection?	<p>a) before making the disclosure, you inform the person to whom you make the disclosure of your name; and</p> <p>b) if the information concerns misconduct, or an improper state of affairs or circumstances, in relation to the company; and</p> <p>c) you consider that the information may assist a person (described above) to perform the person's functions or duties in relation to the company; and</p> <p>d) you make the disclosure in good faith.</p> <p>If you are making the disclosure under the Corporations Act then your disclosure will qualify for protection if:</p> <p>You have reasonable grounds to suspect that the information indicates that the company has, or may have, contravened a provision of the Corporations legislation or an officer or employee of the company has, or may have, contravened a provision of the Corporations legislation; and you make the disclosure in good faith.</p>	s 52A	s 1317AA	s 156A(2)(c)	s 38A	s 336A
If I make a disclosure can it be disclosed to another person or party without my consent?	<p>The company can disclose the information provided under the Group Whistleblower Policy to APRA, ASIC (in the case of disclosures made under the Corporations Act) or the AFP.</p> <p>In all other circumstances, the company must not disclose this information to another party without your consent.</p>	s 52E	s 1317AE	s 156E(2)	s 38E	s 336E
What happens if I make a disclosure and that person discloses the information to someone else?	If the person to whom you make the disclosure discloses the information which is subject to whistleblower protection, or your identity or information that is likely to lead to your identity, without your consent then that person may have committed an offence.	s 52E	s 1317AE	s 156E(d)	s 38E	s 336E

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		Banking Act 1959	Corporations Act 2001	Life Insurance Act 1995	Insurance Act 1973	Superannuation Industry Supervision Act 1993
I am a person authorised by the company to receive disclosures and I have received a disclosure under the Group Whistleblower Policy, what do I do with that information?	Inform the person making the disclosure that you seek their consent to pass the disclosure to Group Security and Advisory in order that it can be assessed. If you do obtain the person's consent to disclose that information to Group Security and Advisory, proceed to do so immediately.	s 52E	s 1317AE	s 156E	s 38E	s 336E
How am I protected by the legislation from victimisation as a result of my disclosures?	It is an offence to threaten to cause a person detriment or to actually cause detriment to a person who makes disclosures which qualify for whistleblower protection.	s 52C	s 1317AC	s 156C	s 38C	s 336C