

QW27: How many employees were investigated for suspected breach of code of conduct last year? Please provide your answer broken down by job classification grade. How many of these employees are no longer employed by the bank? Please provide a job classification breakdown in your answer.

Answer: Westpac's Code of Conduct ('Code') describes the conduct expected of our people, both employees (regardless of level or position) and contractors.

Westpac's expectation of its employees is high and misconduct may arise in a range of circumstances including when there is unacceptable, deliberate, negligent or reckless behaviour which breaches our Code, policies or legal and compliance standards. Breaches of the Code range from serious matters such as fraud, theft and bribery (as outlined in QW25 above), to other breaches of the Code including process and procedural breaches (i.e. failing to follow correct processes), failure to comply with our leave policy and harassment. The data in the table below relates to all breaches of the Code regardless of their nature and includes the serious breaches referred to in QW25.

There are multiple channels for employees to report suspected breaches of the Code.

How a suspected breach of the code of conduct is investigated will depend on the circumstances of the alleged breach and the channel through which the breach was reported.

Since 1 October 2015, 885 people have been formally reported to, and investigated by Westpac's centralised Case Management, Group Investigations or Employee Relations teams.

As a result of these investigations, Westpac has terminated the employment of 139 employees.

Job Classification Grade	# Investigated*	# Terminated*
1. Executive Leadership (General Manager and Exec)	0	0
2. Senior Leadership (Head Of or Senior Manager)	48	2
3. Middle leadership (Manager or equivalent)	135	25
4. Non Leadership	702	112
Total	885	139

* This data represents employees in Australia