Whistleblower Program

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Bank Australia



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Whistleblower Program

1. Purpose

The purpose of the Whistleblowing Program is to provide a framework that requires the reporting of suspected misconduct or unlawful activity within Bank Australia Limited (The Company), and aims to protect the whistleblower from any retaliation that may arise as a result of their disclosure.

It further helps to create processes based on the principles of trust, impartiality and protection.

The Company recognises that an effective Whistleblower Program ('the Program') helps a business to:

- Facilitate reporting of wrongdoing.
- Support and protect whistleblowers and other interested parties.
- Ensure reports of wrongdoing are dealt with in a proper and timely manner.
- Improve organisational culture and governance.

Whistleblowers may have concerns about conduct within the Company which appears to be illegal, unethical or otherwise improper, but may feel apprehensive about raising concerns because of the fear of possible adverse repercussions to themselves or others. The aim of this Program is to give whistleblowers the protections and confidence to raise concerns, by offering a reporting and investigative mechanism that is objective, confidential and independent and seeks to protect them from reprisal or disadvantage.

Under this Program:

- Individuals are required to report their concerns, whether openly or, if required, anonymously;
- If an individual reports a concern, they will be afforded confidentiality unless they choose (or the law requires) otherwise;
- Concerns reported will be properly investigated with a view to establishing the truth and correcting any wrongdoing where proven;
- If an investigation has been conducted, whistleblowers will be advised of the outcome of an investigation and any action taken to the extent that this is practicable; and
- Protection will be provided to whistleblowers who report Reportable Conduct (see 3.2 and 3.3) with a focus on the nature and quality of the information rather than the motivation of the whistleblower.

2. Definitions

Whistleblower – Person(s) who makes or attempts to make a disclosure of reportable conduct.

Reportable Conduct – Reportable conduct matters are set out in this Program.

Whistleblower Policy – The overarching Board approved policy that delegates operational management of whistleblowing protections and a framework for escalating and responding to concerns

Whistleblowing Program – The operational document that sets out how Management will establish and implement practices, procedures and systems to ensure a robust and trusted framework for escalating and responding to whistleblowing concerns.

Staff Code of Conduct – A document establishing the standard of conduct that the Company expects all employees, directors, contractors and consultants to meet.

Whistleblower Protection Officer (WPO) – Designated senior employees responsible for receiving disclosures from whistleblowers and for protecting whistleblowers as set out in this Program.

Whistleblower Investigation Officer (WIO) – A designated senior employee or independent external party engaged by the Company who is responsible for independently investigating disclosures from whistleblowers. Provides an investigation report to the WPO.

Whistleblower Protection Laws – The Corporations Act 2001 (Cth) (Corporations Act) and Taxation Administration Act 1958 (Cth) (Taxation Administration Act (together, the Whistleblower Protection Laws) give special protection to disclosures about certain types of reportable conduct which are made in accordance with the requirements of the Whistleblower Protection Laws.

Eligible recipients – As defined in whistleblower protection laws which include a company officer (director or company secretary), senior manager, auditor, regulators (such as ASIC or APRA) and/or anyone authorised by the Company to receive disclosures.

3. Scope

3.1. Application

This Program applies to all individuals and legal entities having a business relationship with the Company. This includes:

- current, former or prospective directors, officers and employees;
- current, former or prospective contractors, suppliers or associates;
- current, former or prospective consultants, service providers, customers; or
- a relative, dependant or spouse of any of the above.

All persons mentioned above are eligible whistleblowers and play an important role to help detect, prevent and report instances of reportable conduct and are required to raise concerns about any issue or suspicion of misconduct at the earliest possible stage as detailed in section 4 of this Program.

3.2. Reportable conduct

Reportable conduct means any conduct in relation to the Company that includes conduct that is:

- Dishonest;
- Illegal or Fraudulent;
- Corrupt;
- Unethical;
- Theft or embezzlement;
- Money laundering or misappropriation of funds;
- A danger to the environment or workplace health or safety;
- A conflict of interest;
- Indicative of a violation of local laws (including local taxation laws);
- Breach of internal policy (including the Staff Code of Conduct);
- Modern slavery or human trafficking, contrary to the Company policies, including within the Company's supply chain;
- Attempts to conceal any of the above.

Reportable conduct does not include malicious or vexatious complaints or false reporting.

3.3. Personal work-related grievances

Reports which are not about reportable conduct under the whistleblower protection laws and this Program will not qualify for statutory protection, although the Company may provide protection under this Program.

In some circumstances, reports which do not qualify as reportable conduct may still be protected under other legislation, such as the Fair Work Act 2009. For example, even though harassment, discrimination and bullying are a breach of internal policy (under the Staff Code of Conduct) and listed in the Program as conduct which amounts to reportable conduct, personal work-related grievances are not generally considered reportable conduct under Whistleblower Protection Laws.

Personal work-related grievances are issues or concerns which have, or tend to have, implications for employees personally. For example, an interpersonal conflict between employees, a decision relating to an employee's engagement, transfer or promotion, a decision relating to terms and conditions of engagement or a decision to suspend or terminate engagement, or otherwise to discipline an employee.

There may be some instances where a personal work-related grievance also has significant implications for the Company and qualifies for protection. For example, if it includes information about misconduct beyond an employee's personal circumstances, demonstrates a systemic issue or where the Company has breached employment or other laws punishable by imprisonment for a period of 12 months or more, or an entity in the group engages in conduct that represents a danger to the public.

When this is determined to be the case, a report will be considered to be reportable conduct and handled in accordance with this Program.

4. How to make a report

4.1. Internal

Employees and other persons can lodge a report with one of the Whistleblower Protection Officers. If for some reason they believe they cannot report the matter to a Whistleblower Protection Officer, including due to a potential conflict of interest, then they should contact one of the other eligible recipients list below:

Making a Report	Contact Details
Whistleblower Protection Officers	Chief Legal Officer and Company Secretary – Cindy Hansen Cindy.Hansen@bankaust.com.au (02) 9582 3331 Chief People Officer – Sonya Clancy AM Sonya.Clancy@bankaust.com.au (03) 9854 4675 Head of Legal – Pamela Connors Pamela.Connors@bankaust.com.au (03) 9854 4653
Managing Director	Damien Walsh Damien.Walsh@bankaust.com.au
Chief Technology Officer	Scott Wall Scott.Wall@bankaust.com.au
Chief Customer Officer	Steve Odgers Steve.Odgers@bankaust.com.au
Chief Risk Officer	David Fisher David.Fisher@bankaust.com.au
Chief Financial Officer	Anna Milinkovic Anna.Milinkovic@bankaust.com.au
Chief Marketing Officer	Kevin Ramsdale Kevin.Ramsdale@bankaust.com.au
Acting Chief Integration and Transformation Officer	Duncan Macdonald Duncan.Macdonald@bankaust.com.au
Chair of the Board	Jennifer Dalitz Jennifer.Dalitz@bankaust.com.au
Director and Chair of Audit Committee	Steve Ferguson Steve.Ferguson@bankaust.com.au
Director	Joe Dicks Joe.Dicks@bankaust.com.au
Director	Anthony Healy Anthony.Healy@bankaust.com.au
Director	Barry Jackson Barry.Jackson@bankaust.com.au
Director	Clare Mazzetti Clare.Mazzetti@bankaust.com.au

Director	Simon O'Connor Simon.Oconnor@bankaust.com.au
Director	Anne-Marie O'Loghlin AM Anne-Marie.OLoghlin@bankaust.com.au
Director	Dr Marcus Thompson AM Marcus.Thompson@bankaust.com.au
Director	Sally-Ann Williams Sally-ann.Williams@bankaust.com.au

4.2. External disclosures

If eligible whistleblowers are not comfortable or able to report misconduct internally, they may report it to the Company's external and independent whistleblowing service provider, PKF Integrity Services.

The Company has contracted these services to receive and manage reports with impartiality and confidentially.

PKF Integrity Services

The reporting options include:

- Website https://talkintegrity.com/?baust
- Email: bankaustraliahotline@pkf.com

Or you can write to the Whistleblower Administrator at:

PKF Integrity Services (BMNS)
Pty Ltd Level 8, 1 O'Connell Street
Sydney NSW 2000

National Relay Service

If whistleblowers are deaf, or have a hearing or speech impairment, they can contact our disclosure services online or through the National Relay Service. Simply choose your contact method at https://www.accesshub.gov.au/ and request the relevant hotline number.

Translating and Interpreting Service

If whistleblowers have difficulty speaking or understanding English, they can contact our disclosure services through the Translating and Interpreting Service (https://www.tisnational.gov.au/) on 131 450 and ask for the relevant hotline number.

4.3. External – regulators

In addition to whistleblower rights under this Program, they may communicate with a government agency, law enforcement body or a regulator (i.e. ASIC, APRA or the ATO), including making a disclosure or reporting a breach of their legislative protections as a whistleblower, in accordance with any relevant law, regulation or prudential standard applicable to the Company.

Making a Report	Contact Details
APRA	Website: https://www.apra.gov.au/become-a-whistleblower-or-make-a-public-interest-disclosure 1300 558 849
ASIC	Website: https://www.asic.gov.au/about-asic/contact-us/how-to-complain/ 1300 300 630
ATO	Website: https://www.ato.gov.au/general/gen/whistleblowers/ 1800 060 062

Note: Section 1317AAD of the Treasury Laws Amendment (Enhancing Whistleblower Pro-tections) Act 2019 allows whistleblowers to disclose information to a member of parliament or a journalist if no action is taken within 90 days in certain circumstances relating to a public interest disclosure. The rules relating to a disclosure under this section are complex and it is recommended that whistleblowers seek independent legal advice on the relevant provisions and exercise due diligence if considering making a disclosure under this section of the act.

4.4. Disclosures to auditors

Internal and external auditors are also eligible recipients to receive reports, and are required to handle the information in accordance with this Program. All reports received by auditors will be referred to a WPO unless there are exceptional circumstances.

4.5. Disclosures to legal practitioners

Whistleblowers may also seek independent legal advice before or after making a disclosure or during the investigation process, which may help them to further understand their rights and protections. This Program does not limit a whistleblower's right to make a disclosure to a legal practitioner for the purposes of obtaining legal advice.

4.6. Disclosures to Tax Authorities

Tax-related disclosures can also be made to:

- the Tax Practitioners Board (TPB) or the Commissioner of Taxation (the ATO), where the discloser considers the information may assist the TPB to perform its functions or duties under the Tax Agent Services Act 2009 (Cth) (TASA) or an instrument made under that Act;
- the Inspector-General of Taxation (IGT), whose role is to undertake investigations into tax administration systems established by the ATO, TPB and tax laws;
- a medical practitioner or psychologist, for the purposes of obtaining assistance in relation to the disclosure.

All reports received by these tax authorities will be referred to the appropriate internal Whistleblower Protection Officer (WPO) unless there are exceptional circumstances.

5. Roles and responsibilities

5.1. Whistleblower Protection Officer (WPO)

Due to the size and scope of the Company, three WPOs have been appointed to assist whistleblowers in reporting reportable conduct and to safeguard the interests of the whistleblower in terms of this Program. All reports received by other eligible recipients will be referred to a WPO. The Company will use reasonable efforts to ensure the relevant WPO is not implicated directly or indirectly in the matter and/or does not have a conflict of interest.

The WPO will:

- Provide assurance to a whistleblower that the Company is committed to protecting their welfare;
- Provide assistance to a whistleblower (before or after they report) in relation to the process and this Program;
- Consider whether the conduct raised amounts to reportable conduct and where it clearly does not, inform the person who raised the conduct of any other steps outside of the whistleblower process that can be taken to address the allegations;
- Arrange for the reportable conduct to be investigated;
- Maintain the confidentiality, privacy, and anonymity (as required) of the whistleblower;
- Report any potential investigation outcome to the whistleblower;
- Promote awareness of this Program and the raising of reportable conduct by integrating the information into employee training;
- Report on trends and provide a summary of whistleblower matters to the Board and executive management while maintaining the confidentiality and anonymity of the whistleblower as required; and
- Have direct and unfettered access to independent financial, legal and operational advisers as required.

5.2. Whistleblower Investigation Officer (WIO)

The WPO will appoint a WIO once a report has been made by a whistleblower in order to investigate the substance of the report to determine whether there is evidence in support of the matters raised, or to refute the report made.

The WIO will:

- Be a staff member from the second line of defence or People and Culture, who is not implicated directly or indirectly in the disclosure and does not have a conflict of interest to its knowledge, or an external investigator appointed by the Company, to ensure any potential investigation is unbiased;
- Conduct the investigation into reportable conduct in a manner that is confidential, fair and objective;
- Safeguard the interests of the whistleblower at all times, and keep them informed of the investigation's progress in a timely manner;

- Ensure all information is held securely and in strict confidence; and
- Provide an investigation report to the WPO. The WPO and WIO are not to be the same person, as the two roles must operate independently of each other.

6. Investigating reportable conduct

All reports that are investigated will be done so thoroughly, with the objective of locating evidence that either substantiates or refutes the claims made by the whistleblower.

6.1. Investigation

All potential investigations will be conducted by the WIO who will follow best practice in investigations and be fair and independent of the business unit concerned, the whistleblower or any person that is the subject of the reportable conduct.

The investigation will observe the rules of natural justice, e.g. the investigation will be conducted without bias and the person against whom an allegation is made will be given the right to respond. Consideration will be given to employing outside investigators in the interest of objectivity, particularly where an allegation is serious.

The WIO will develop an investigation plan to assist in documenting and managing the investigation. Considerations for the WIO in controlling and managing the investigation include:

- The involvement of legal advisers, especially to work with investigators and for legal professional privilege protection;
- Management priorities concerning fraud;
- The process to agree on whether the police should be contacted and when;
- The reporting line, method and frequency of investigation updates and final report;
- Privacy considerations; and
- Whether any reportable conduct or event is covered under the Company's corporate insurance.

6.2. Privacy and confidentiality

Any potential investigation will maintain privacy and confidentiality, except as required by law, including:

- The fact that an investigation is being conducted, unless permitted;
- The subject matter;
- The source of the investigation;
- Information collected by the investigator;
- The identity of any witness or suspects;
- Any documents (including electronic) collected and prepared during the investigation; and
- Discussions with employees.

The investigation will conclude with a report from the WIO or other investigator. The report will include findings on the allegations and a summary of the evidence on which the findings are based.

The Company has a legal obligation to protect a whistleblower's identity if they make a report and is committed to ensuring that reports are managed with appropriate confidentiality and in accordance with the Program and statutory requirements.

The Company will not disclose information that is likely to lead to a whistleblower's identification as part of its investigation process unless it is required by law or;

- The information does not include their identity;
- The Company removes information relating to their identity or other information that is likely to lead to their identification (e.g. name, position title and any other identifying details); or
- It is reasonably necessary for investigation of the issues raised in their report.

Other steps the Company will take in practice to protect the confidentiality of a whistleblower's identity include, but are not limited to, redacting, where possible, their personal information or references to them witnessing an event, and contacting them (where possible) to help identify aspects of their report that could inadvertently identify a whistleblower.

7. Reporting and communication

7.1. Culture of compliance

The Company requires a culture of compliance as minimum practice and has a zero tolerance to behaviours that compromise compliance. To this end, all verifiable corruption and compliance failures identified from whistleblowing will be dealt with appropriately, and any systemic or recurring problems of corruption or non-compliance will be reported to those with sufficient authority to correct them.

The WPO has a direct line of reporting to the Managing Director and the Audit Committee.

In cases where the Managing Director has been accused of reportable conduct, or where he or she has a close relationship with the person against whom the accusation is made, the WPO will have direct access to the Audit Committee.

7.2. Notifying the whistleblower

The WPO will maintain relevant communication with the whistleblower with regard to the information relating to reporting and escalation process and assurances around anonymity and protections.

The WPO will report the status and resolution of the whistleblower's claim directly to the whistleblower. Due to confidentiality reasons and the need to protect the interests of all parties to any potential investigation, information provided to the whistleblower regarding resolution may be limited.

7.3. Notifying the Board

The WPO will notify the Board with de-identified information about the number and type of disclosures under this Program as deemed appropriate by the WPO.

Disclosures should be timely but must take steps to protect the anonymity of the whistleblower and the integrity of any investigation.

Any business issues identified during an investigation will be assigned to the relevant business unit for remediation.

8. Protections for whistleblowers

The Company believes that in order to foster a culture that requires the reporting of reportable conduct, administrative immunity should apply for whistleblowers. The Whistleblower Program prohibits actions that disadvantage the whistleblower personally or financially in retaliation against their reporting. All reasonable steps will be taken to protect whistleblowers from detrimental acts or omissions related to their report, including matters related to their employment, and will extend for a period after the investigation has been finalised.

The Company will not tolerate any detrimental acts or omissions that are inflicted against a whistleblower reporting reportable conduct. Where a whistleblower acts honestly has objectively reasonable grounds for their suspicions, and has not engaged in false reporting, illegal conduct, misconduct and has not acted maliciously, or vexatiously, they will be provided with internal immunity from disciplinary proceedings and will be protected internally from any form of retribution, including dismissal, demotion, harassment, discrimination, or current or future bias.

Where it is shown that a person purporting to be a whistleblower has made a false report of reportable conduct and has not acted with reasonable grounds to suspect, then that conduct itself will be considered a serious matter and may render the person concerned subject to disciplinary proceedings.

Note that the Company is subject to obligations at law and it does not have the power to offer any person immunity against prosecution in the criminal jurisdiction. It also cannot extend the full level of protections to whistleblowers who are not directly employed by the Company.

If a whistleblower is found to have been involved in any serious misconduct or unlawful activity, they may not be protected in relation to their role in that misconduct or unlawful activity, although in some cases the making of a report may be a mitigating factor.

A whistleblower does still qualify for protection even if their disclosure turns out to be incorrect.

8.1. Statutory protections

Whistleblower Protection Laws give special protection to disclosures about certain types of reportable conduct which are made in accordance with the requirements of the Whistleblower Protection Laws.

The protections in the Whistleblower Protection Laws will only apply to whistleblowers if they are:

- An eligible whistleblower (section 3.1); and
- Make a report (internally or externally) of reportable conduct.

Under Whistleblower Protection Laws in Australia, the statutory protections that are available include:

- The right to have their identity protected;
- The right to have information they provide as part of the disclosure handled appropriately;
- The right to be protected from civil, criminal or administrative liability for making the disclosure; from contractual or other remedies based on the disclosure; and from the admissibility of the information provided in evidence against them;
- The right to be protected from detrimental treatment or any form of victimisation;
- The right to compensation and other remedies (including the right to litigation costs relief) for breach of the legislative protections. A whistleblower should seek independent legal advice in these circumstances; and
- The right not to be required to disclose their identity before any court or tribunal.

The protections apply from the time a whistleblower makes a report addressing reportable conduct, irrespective of whether a report has been made internally to the Company or externally (for example, to ASIC or APRA) to a legal practitioner, or regulatory body. Disclosures can be made anonymously and still be protected.

The Company encourages whistleblowers to make disclosures to us in the first instance where possible. Whistleblower Protection Laws also provide protections for public interest disclosures and emergency disclosures to journalists and members of Commonwealth, state or territory parliaments which meet specific requirements prescribed by the Corporations Act.

For such protections to apply, a disclosure must have previously been made directly to ASIC, APRA or another Commonwealth prescribed body and written notice provided to the body to which the disclosure was made.

In the case of public interest disclosures, at least 90 days must have passed since making the report. It is important that whistleblowers understand the criteria for making public interest or emergency disclosures. It is recommended that whistleblowers seek independent legal advice on the relevant provisions to help them understand their rights and protections.

8.2. Reprisals

Where reprisals are taken or claimed to have been taken against a whistleblower, the whistleblower can raise these concerns with the WPO managing their report for further investigation and rectification. If it is established that a person is exhibiting unacceptable behaviour towards whistleblowers they may have disciplinary action taken against them for such victimisation.

If the whistleblower is an employee and has concerns about adverse action related to their employment, they may raise their concerns with the WPO. This protection is also extended to any WIO involved in an investigation with the same avenues for review, investigation and compensation.

9. Anonymity

The Whistleblower Program provides for anonymous disclosures by whistleblowers.

A whistleblower who reports or seeks to report reportable conduct is guaranteed anonymity (if requested) with a duty placed on the recipient of information from a whistleblower not to reveal the whistleblower's identity. However, in certain circumstances, the law may require disclosure of the identity of the whistleblower to ASIC, APRA, the Australian Federal Police, or with the consent of the whistleblower.

Once a whistleblower lodges a report with the WPO the information provided by the whistleblower is held in the strictest confidence and will only be disclosed to a person not connected with the investigation of the matters raised:

- If the whistleblower has been consulted and consents in writing to the disclosure; or
- If the WPO, WIO or the Company is compelled by law to do so.

A person who comes into possession of information from a whistleblower must not release this information without authority to any person not involved in the investigation or resolution of the matter unless provided in the Program. Also, the identity of, or any information that may lead to the identification of, a whistleblower must not be released to any person not involved in the investigation or resolution of the matter. Any breach of this requirement will be regarded by the Company as a serious disciplinary matter and dealt with accordingly.

Other steps the Company will take in practice to protect a whistleblower's anonymity include (but are not limited to), communicating with them on an anonymous basis, communicating with them using any anonymised email address if provided that as a means to facilitate two-way communication with the Company and allowing them to adopt a pseudonym for the purposes of their report. The Company will respect a whistleblower's right to not identify themselves. However, by electing to make a report anonymously, this may hinder the ability to fully investigate a whistleblower's report, particularly if they do not provide a means for contacting them.

10. Support for whistleblowers

WPOs can provide assistance to a whistleblower (before or after they report) in relation to the whistleblower process and this Program.

If employees are facing a difficult ethical issue, we encourage them to make use of the telephone counselling service that is available via The Ethics Centre[1]. Ethi-call[2] is a free and confidential ethics counselling service which aims to promote responsible decision making and to relieve the distress felt by people dealing with such decisions.

The Company also has an Employee Assistance Program (EAP) which provides free professional confidential counselling services for employees, including support and advice by independent counselling professionals. The EAP can help employees to clarify a problem, identify options and help to develop plans to approach difficult issues in a constructive manner.

The service is available by calling 1300 360 364 or via their website[3]. Further information for employees is also available on the intranet here[4].

1 https://ethics.org.au/

2 https://ethics.org.au/initiatives/ethi-call/

3 https://www.benestar.com/

4 http://intranet/peopleandculture/PeopleandCulture/EAP.html

11. Awareness and accessibility

The Company recognises that an effective program should be known and accessible. It should also help the Company learn about any cultural and conduct problems and ethical behaviour in the business, improve business practices and reduce business risks. This is achieved through:

- The Company's Staff Code of Conduct which outlines acceptable workplace behaviours;
- Mandatory training (upfront and ongoing) on the Whistleblower Program to all employees, including specialised training to staff responsible for key elements of the Program;
- Publication of the Whistleblower Program on the Company's intranet and external website to ensure staff, brokers, agents, contractors and other relevant third parties can access relevant resources, as required;
- Regular tracking and reporting to the Audit Committee on the number, nature and status of whistleblowing concerns, claims and investigations;
- Consideration by the Board, Audit Committee, Internal Auditor, Managing Director and Management, including the WPOs, of the findings and implications of any systemic or recurring problems of corruption or non-compliance coming from the program and ensure that a process exists to embed improvements from these findings, and other internal audits or related reviews; and
- Provision to the WPOs of direct and unfettered access to independent financial, legal and operational advisers as required.

12. Administration of this program

This Program is to be reviewed at least every three years or in the event of any changes to the Australian Standard or new Guiding Principles. Any changes are to be submitted to the Managing Director for final review and approval.

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