

# Summary of the Westpac Group Speaking Up Policy

## 1. Purpose

### 1.1 Overview

The Summary of the Westpac Group Speaking Up Policy (formerly the Whistleblower Protection Policy) (**policy**) is one of a number of policies and codes that promote a culture of conducting our business with honesty, fairness and integrity. The Speaking Up Policy provides guidance on how to raise a concern about suspected or actual unethical or unlawful behaviour.

### 1.2 Senior Management Commitment

Westpac's senior management is committed to protecting the dignity, wellbeing, career and reputation of anyone reporting wrongdoing. All reports made under this policy are treated seriously and will be investigated carefully. Anyone raising a concern under this policy should feel confident that they can do so without fear of retaliation, even if they turn out to be mistaken.

## 2. Scope and application

The Speaking Up Policy extends to all businesses within Westpac other than subsidiaries which are independent legal entities and which are required to have their own policies and governance frameworks.

The policy applies to all:

- current and former directors
- current and former employees, temporary staff (including secondees and contractors)
- current and former service providers (e.g. auditors, accountants, brokers and consultants) and suppliers
- employees of current and former service providers/suppliers.

Although they are under no obligation to do so, an associate, family member or dependent of any person in the above groups of people may also speak up. If they do choose to speak up, we will extend the relevant rights and protections under this policy.

Please note that this policy does **NOT** apply to customer complaints or concerns about Westpac, its staff or contractors. Customers may raise their concerns face-to-face at a branch, over the phone, in writing, or online via the secure feedback form. For further

information refer to <https://www.westpac.com.au/contact-us/feedback-complaints/> or call 132 032.

### 3. Speaking up channels

Westpac has a number of channels for speaking up. Employees are encouraged to use normal business channels first for issues relating to their own personal circumstances or where normal business procedures exist, except where a whistleblower believes they may suffer personal disadvantage or wish to use the protections under this policy.

In addition our policy establishes dedicated whistleblowing channels:

- Concern Online (an internal reporting system, with the option of anonymity);
- Whistleblower Protection Officer; and
- Whistleblower Hotline (a 24 hour, externally managed hotline, with the option of anonymity). See contact details at the end of the document.

### 4. Reporting reportable conduct (speaking up)

#### 4.1 Who can speak up?

A person who speaks up under this policy, also known as a whistleblower, is defined as anyone who makes, or attempts to make, a report under sections 4 and 5 of this policy. It also includes any person Westpac determines is a whistleblower and should be protected as a result of making a report.

#### 4.2 What is reportable conduct?

Reportable conduct is defined as any past, present or likely future activity, behaviour or state of affairs considered to be:

- Dishonest
- Corrupt (including soliciting, accepting or offering a bribe, facilitation payments or other such benefits)
- Fraudulent
- Illegal (including breach of any of the financial services laws, theft, drug sale or use, violence or threatened violence and property damage)
- In breach of any regulation, internal policy or code (such as our Code of Conduct)
- Impeding internal or external audit processes
- Improper relating to accounting, internal control, compliance, actuarial, audit or other matters of concern to the whistleblower

- A serious impropriety or an improper state of affairs or circumstances
- Endangering health or safety
- Damaging or substantially risking damage to the environment
- Endangering the financial system
- A serious mismanagement of Westpac resources
- Detrimental to Westpac's financial position or reputation
- Maladministration (an act or omission of a serious nature that is negligent, unjust, oppressive, discriminatory or is based on improper motives)
- Concealing reportable conduct.

Reportable conduct usually relates to the conduct of Westpac staff, but it can also relate to the actions of a third party, such as a customer, supplier or service provider.

To make a report, you must have reasonable grounds to suspect the reportable conduct.

### 4.3 What information do I need to provide in my report?

For a report to be investigated, it must contain enough information to form a reasonable basis for investigation. It's important therefore that you provide as much information as possible. This includes any known details about the events underlying the report including:

- date
- time
- location
- name of person(s) involved
- possible witnesses to the events
- and evidence of the events (e.g. documents, emails).

In your report, include any steps you may have already taken to report the matter elsewhere or to resolve the concern.

### 4.4 How do I report a concern?

Westpac has several confidential speaking up channels. You can opt to remain anonymous if you wish.

**Are you a current employee, temporary staff member, director or contractor with intranet access?**

You can report your concerns online via Concern Online.

**Are you a current or former Westpac employee, service provider, broker, supplier (or their associate, family member or dependent)?**

- Contact a **Whistleblower Protection Officer** on (02) 8253 2607, or +612 8253 2607 from outside Australia; or
- Call the **Speaking Up 24-hour hotline**:
  - Australia freecall: 1800 989 569
  - Australia: +61 3 9999 2015
  - New Zealand freecall: 0800 650 116
  - China freecall: 400 120 0468
  - Fiji freecall: +61 3 9999 8922
  - Hong Kong freecall: 800 966 218
  - India freecall: 000 800 919 0238
  - Papua New Guinea freecall: +61 3 9999 8922
  - Singapore freecall: 800 130 1612
  - United Kingdom freecall: 0800 069 8790

#### 4.5 How are reports investigated?

We investigate and record all concerns confidentially, fairly and objectively. An Investigation Officer will be assigned to conduct the investigation. The Investigation Officer is a senior staff member, who is not implicated directly or indirectly in the report. The Investigation Officer provides regular updates to the person reporting the concern, where possible.

#### 4.6 How long will the investigation take?

The investigation process will vary depending on the nature of the reportable conduct and the amount of information provided. The Investigation Officer aims to conclude the investigation within two months of the report.

If the report raises complex issues and the Investigation Officer considers it impossible to conclude the investigation within two months, he or she will attempt to notify the individual who reported the concern of the expected investigation timeframe.

If there is insufficient information to warrant further investigation, or the initial investigation immediately identifies there is no case to answer, the Investigation Officer will notify the person speaking up at the earliest possible opportunity.

#### 4.7 Will I receive feedback about the investigation?

The Investigation Officer will tell you the outcome of the investigation, where possible. This is usually done through the channel you used for the original report.

Potential outcomes are:

- Your concern was substantiated and appropriate action has been taken
- Your concern was not substantiated and no further action will be taken unless further evidence becomes available
- A determination was not possible and no further action will be taken unless further evidence becomes available.

You may be provided with further feedback, subject to the privacy and confidentiality rights of any individual under investigation or any other Westpac confidentiality requirement.

#### 4.8 If you are not satisfied

If an individual reporting the concern considers that their report has not been dealt with in accordance with this policy, or has a reasonable basis for being dissatisfied with the investigation outcome, the matter can be escalated to the Whistleblower Protection Officer.

#### 4.9 What protection and support will I receive?

We understand that you may be worried about possible repercussions from reporting a concern. If you have reasonable grounds to suspect reportable conduct, even if it turns out your concerns are mistaken, we will support and protect you and anyone else assisting in the investigation.

We will also provide relevant protection and support to those who are not directly employed by Westpac at the time the report is made. However, we will not be able to provide protections outside of Westpac's control, for example in relation to an individual's employment conditions with another employer.

Westpac does not tolerate retaliation or adverse action related to a speaking up disclosure. This includes action such as:

- dismissal, suspension, demotion or being overlooked for future promotions and career opportunities
- any form of harassment, bullying, intimidation or threatening behaviour
- current and future discrimination or bias
- disciplinary action for making the whistleblower report
- harm or injury including psychological harm
- damage to a person's property

- damage to a person’s reputation
- damage to a person’s business or financial position
- any other damage
- threatening to carry out any of the above actions.

Anyone found to be victimising or disadvantaging someone for making a disclosure under this policy will be disciplined and potentially dismissed.

Westpac will appoint one or more Whistleblower Protection Officers. The Whistleblower Protection Officer is a senior employee responsible for providing certain protections for individuals who are concerned that they may experience personal disadvantage as a result of speaking up.

Anyone covered by this policy may approach, or seek advice from, the Whistleblower Protection Officer before, during, or after making a speaking up report. The Whistleblower Protection Officer can protect you by:

- ensuring confidentiality in the investigation
- protecting, as far as legally possible, your 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 you believe you have suffered personal disadvantage in violation of this policy, we encourage you to report this immediately through one of the speaking up channels. Your concerns of being disadvantaged will be treated as a report of reportable conduct, and the Speaking Up Policy will apply.

#### 4.10 How does Westpac ensure confidentiality?

We understand that you may be worried about possible reprisals from speaking up. You can choose to remain anonymous, but we do encourage you to disclose your identity. This will help us monitor your wellbeing and protect you against personal disadvantage. It will also help us get further information on your report.

If you choose to disclose your identity, your details will only be used in connection with the investigation and your identity will not be disclosed to anyone else unless:

- Westpac is legally obliged to disclose the identity
- the disclosure is required if and when Westpac decides to report to relevant regulatory or police authorities
- disclosure is necessary to prevent or lessen a threat to a person’s health, safety or welfare or
- you consent in writing to the disclosure.

All information received from you, as well as the fact that you have made a disclosure, is held securely and remains strictly confidential.

If you implicate your own conduct in the report you will not be given immunity from investigation, disciplinary action, criminal prosecution and/or civil liability. The same applies to anyone assisting in an investigation. However, we will take your disclosure and cooperation with the investigation into consideration when determining disciplinary or other actions.

## 5. Training, monitoring and assurance

### 5.1 What training does Westpac provide?

Westpac's Speaking Up program is part of our mandatory training for all employees. Specialist training is given to employees responsible for key elements of the program.

### 5.2 How does Westpac monitor the welfare of those speaking up?

To ensure effective protection under this policy, Human Resources monitors the welfare of employees speaking up under this policy.

### 5.3 How does Westpac monitor the Speaking Up program?

Several board committees are provided with quarterly reports about, and oversee, Westpac's speaking up program.

**Effective date:** November 2018