

A close-up photograph of several hands, likely belonging to children, with fingers spread. The hands are covered in thick, vibrant paint in various colors including red, purple, yellow, green, and pink. The paint is applied in a way that covers the entire surface of the hands, with some areas showing more than one color. The background is dark and out of focus.

WESTPAC BANKING CORPORATION
ABN 33 007 457 141

Child Safeguarding at Westpac

Supplement to Westpac Group's
Human Rights Position Statement
and Action Plan

OCTOBER 2024

Position Statement Owner: Chief Sustainability Officer

Effective date: May 2023

Version: 1.2

The Westpac Group logo, featuring a stylized red 'W' followed by the text 'estpac GROUP' in a sans-serif font.

Our position and approach

Our position on child safeguarding is set out in Westpac Group’s broader Human Rights Position Statement and Action Plan¹. This document is intended to provide additional information to interested stakeholders.

Since the AUSTRAC civil proceedings in December 2019, we have continued to build our understanding of existing and emerging risks to children and young people in physical and online environments and our own knowledge in promoting the financial safety of children and young people who access our products and services.

We recognise that the need for a child safe culture extends beyond organisations that engage directly with children and that we have a role to play in identifying, preventing, mitigating, and accounting for our adverse human rights impacts related to children and young people. While we cannot entirely eliminate risks, we can work to enhance existing processes to seek to identify, prevent and mitigate harm, and play a role in advancing the fulfilment of children’s and young people’s rights where relevant to our business.

Our approach to undertaking due diligence, providing for, or cooperating in remedy, and undertaking stakeholder engagement is aligned with our Board-approved human rights approach. To date, we have considered child safeguarding in an Australian context only; however, our goal is to assess child safeguarding risks and impacts, if any, as part of our annual review of our ‘salient human rights issues’.

We are committed to conducting our business in a way that respects the human rights of our people, business partners (including our customers and suppliers), the communities we support and in which we operate, as well as of others who may be impacted by our activities and business relationships.

This includes respect for those internationally recognised child rights set out in the International Labour Organization’s (ILO) Conventions *No.182 on the Worst Forms of Child Labour* and *No.138 on Minimum Age*.

We also seek to deepen our understanding of how we can respect the rights set out in:

— [*UN Convention on the Rights of the Child*²](#)

We are further guided by the:

— [Children’s Rights and Business Principles](#)

— [Australia’s National Principles for Child Safe Organisations](#)

— [Australia’s National Plan to End Violence against Women and Children 2022 - 2032](#)

We also support the *UN Guiding Principles on Business and Human Rights (UNGPs)* and they form the foundation of our human rights approach.

ACKNOWLEDGMENT OF INDIGENOUS PEOPLES

Westpac acknowledges the First Peoples of Australia and recognises their ongoing role as Traditional Owners of the land and waters of this country, and we pay respect to Elders past and present. We extend that respect to Westpac’s Aboriginal and Torres Strait Islander employees, partners, and stakeholders, and to the Indigenous Peoples in the other locations where we operate.

In Aotearoa (New Zealand) we also acknowledge tāngata whenua and the unique relationship that Iwi Māori share with all New Zealanders under Te Tiriti o Waitangi.

¹ Refer to the Westpac [Human Rights Position Statement and Action Plan](#).

² In particular, Article 12 – respect for children’s views, Article 16 – protection of privacy, Article 18 – responsibility of parents, Article 28 – access to education, Article 32 – protection from harmful work, and Article 34 – protection from sexual abuse. Visit *Our Focus Areas: Child safe organisation* and our [Safer Children, Safer Communities program](#) for more information.

Our role

While our direct engagement with children and young people can be limited, we may be connected to impacts on their rights and wellbeing through:

- Customers exploiting our financial platforms and products.
- Design of products and services that may not fully take into account the interests of children and young people, including those that might need extra care.
- Gaps in screening during customer onboarding and recruitment processes that may increase potential child exploitation risks.
- Occurrences of the worst forms of child labour such as child trafficking, forced or compulsory labour in our supply chain and/or the supply chains of our suppliers and customers.
- Our access to and handling practices of customer personal information, where the customer is a child or young person.
- Accessing inappropriate information relating to children using Westpac technology.
- Inappropriate interactions with children and young people in physical environments such as our branches or workplaces.

Our principles

We are committed to strengthening our focus on child safeguarding in Australia, initially. The principles that guide and inform our child safeguarding approach are:

Safety by design: where applicable, we evaluate the fairness and suitability of our products and services for children and young people, including with consideration for any actual or potential risks, adverse impacts or opportunities to create a positive impact.

Include the voice of children and young people: when making decisions that may affect their wellbeing, our approach is informed by working with organisations that involve and represent the voices of a diverse group of children and young people including Indigenous children, those in out-of-home care and those with disabilities.

Promote responsible financial behaviours for children and their parents and carers: we seek to encourage safe and responsible spending and saving behaviours while helping to increase financial literacy and awareness.

Set clear expectations for employees, contractors, and suppliers: in relation to child safety and wellbeing, which are guided by our [Responsible Sourcing Code of Conduct](#) and [Code of Conduct](#). If an employee or contractor is found not to meet expectations, we have a consequence management framework to guide our approach to disciplinary actions.

Mitigate risks for children across financial transactions: we will, where applicable, continue to review and refine our approach through risk assessments across our products and services, channels, jurisdictions, and our processes for customer due diligence, payment and risk-based customer screening and transaction monitoring.

Partner for progress: we seek to partner with a range of stakeholders to deepen our understanding of their expectations around our child safeguarding practices and to raise our awareness of emerging risks and trends in relation to child protection and safety.

Child Safeguarding Action Plan

These are the key areas of strategic focus guiding our *Action Plan* on child safeguarding. We aim to implement the actions in our *Action Plan* by May 2026 unless otherwise specified. Our primary focus will initially be on our Australian operations. We will continue to review our progress and aim to update and refine our *Action Plan* as needed so it remains relevant and aligned with our commitments and ambition.

STRENGTHENING A FOCUS ON CHILD SAFEGUARDING				
	Safety by design in products and services related to children and young people	Child labour risks in our supply chain	Child exploitation risks across financial transactions	Strengthening grievance mechanisms and approach to remedy for children and young people
OBJECTIVES	Design our products and services for children and young people so they are fit for purpose and promote safe and responsible financial behaviours	Identify, mitigate, and manage risks related to child labour across our supply chain	Put measures in place to mitigate risks associated with customers potentially exploiting our products for criminal purposes, including for example, child exploitation or abuse	Strengthen our grievance mechanisms for children and young people, where appropriate, so they are effective and fit-for-purpose and inform the role we play in remedy
ACTIONS	<div><div><div>1. Take steps to better integrate safety by design principles into our product and lifecycle process.</div><div>2. Design product and service features for children and young people and their parents and carers that promote safe and responsible financial behaviours and prevent misuse.</div></div><div><i>In pursuing this action, we recognise that children and young people are increasingly accessing financial products and services, both in physical and online environments, participating in decision-making around money management as well as generating income in non-traditional ways making it important to reduce their exposure to harm..</i></div></div>	<div><div><div>1. Manage and monitor modern slavery risks including child labour risks in our supply chain.</div><div>2. Undertake due diligence in areas of our supply chain which are at higher risk of modern slavery (including the worst forms of child labour).</div></div><div><i>In pursuing this action, we recognise that a total of 3.3 million children are estimated to be in situations of forced labour³ highlighting the need to continue to focus on addressing potential child labour in our supply chain.</i></div></div>	<div><div><div>1. Integrate and enhance consideration for child sexual exploitation and abuse across our financial crime processes.</div><div>2. Prioritise the reporting of all suspected cases of child sexual exploitation to AUSTRAC within one business day of a suspicion being formed⁴.</div></div><div><i>In pursuing this action, we recognise that while we can't entirely eliminate the risks of customers potentially exploiting our products for criminal purposes, through our regulatory frameworks, we have and will continue to put measures in place to mitigate these risks including through risk assessments across products, channels and jurisdictions, customer due diligence, payment and risk-based customer screening and transaction monitoring.</i></div></div>	<div><div><div>1. Review and seek to strengthen the effectiveness of our grievance mechanisms and our approach to remedy with an initial focus on children (minors) and young people.</div></div><div><i>In pursuing this action, we recognise that child-friendly grievance mechanisms can be an important source of information for the bank on a child and young person's daily experiences and are particularly important for those who are more marginalised and at risk of having their rights violated (e.g., children and young people in out of home care, in remote locations, victims of violence).</i></div></div>

³ According to the International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM): [Global Estimates of Modern Slavery](#). Figures are as of 2021.

⁴ AUSTRAC deadline for reporting is within three business days. Visit <https://www.austrac.gov.au/business/how-comply-and-report-guidance-and-resources/reporting/suspicious-matter-reports-smrs/submitting-your-smr>.

⁵ With reference to the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights, UN Guiding Principle 31, which outlines that grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

Feedback, complaints and questions⁶

Westpac Whistleblower Policy

The Westpac Group [Speaking Up Policy](#) encourages current and former employees (including contractors, temporary employees and secondees), brokers, service providers and suppliers (including their current and former employees) to raise any concerns about our activities or behaviours that may be unlawful or unethical, including human rights concerns.

The [Speaking Up Policy](#) outlines how eligible persons can speak up under the policy. For our current employees, this may be via their People Leader or dedicated specialist human resources and risk teams.

Employee Grievance Process and workplace matters

Employees are actively encouraged to speak up about concerns or risks impacting them or others in the workplace, including sexual harassment, discrimination, bullying or harassment, health, safety and wellbeing (HSW), compliance and/or matters that may impact our customers, or other human rights concerns. Westpac policies, practices, training and reporting processes enable the reporting and addressing of raised concerns, including prompting a formal workplace investigation by a specialist Human Resource (HR) and/or HSW team when required.

Employees can raise a concern via our usual business channels, including via their People Leader, HSW hazard and incident management system and/or dedicated channels managed by specialist human resources and risk teams. Former employees can raise historical workplace concerns by contacting a senior leader or the HR Service Centre, and these concerns are referred to the relevant HR team for review and resolution.

Employees in Australia can also raise concerns about matters arising under the Westpac Group Enterprise Agreement (EA) or National Employment Standards in accordance with the disputes process under our EA.

Employees may appoint a representative at any stage of the dispute resolution process, including a union, legal or other representative.

Feedback and Complaints process

We strive to provide the best possible service for our customers and to do our best to resolve any concerns, including human rights concerns, quickly and fairly.

Our public [Complaints Policy](#) provides guidance on how customers may provide feedback or lodge a complaint. Guidance is also available for customers with accessibility requirements, in various languages, and in an '[Easy English Guide](#)' which can be found on our '[Feedback and complaints](#)' website.

⁶ These mechanisms operate in Australia. Certain locations operate region-specific feedback and complaints mechanisms.

Customers can raise feedback or a complaint:

- By calling us. Telephone numbers are set out in the Complaints Policy.
- Online via Internet Banking or our banking App.
- By emailing us at:
 - westpaccustomersolutions@westpac.com.au or by writing to us. Postal address is set out in the Complaints Policy.
- In-person by visiting us in branch or speaking to your Relationship Manager or Private Banker.
- By calling the [Indigenous Call Centre](#) team.
- By calling the [National Relay Service](#).

The Group also has a [Customer Advocate](#) who can be contacted by completing a [secure feedback form](#) and whose role is to listen to customers and recommend changes be made to bank policies, procedures and processes where appropriate.

Customers and members of the public (including those who may be impacted through a Westpac business partner, such as a customer) are also able to raise feedback or a complaint online via Westpac's '[Feedback and Complaints](#)' form. Feedback and complaints can also be received via social media or independent bodies such as the Australian Financial Complaints Authority (AFCA) and Australian Human Rights Commission.

Sustainability-related feedback and complaints

Any member of the public (including those who may be impacted through a Westpac business partner, such as a customer) is able to raise feedback and complaints about sustainability-related matters, including human rights, environmental or climate change concerns linked to our operations, products or services.

Anyone can raise a concern by contacting the Westpac Group Sustainability team at sustainability@westpac.com.au.

Counselling and support services

If you or someone you know is impacted by child sexual abuse and online child sexual exploitation there are support services available.

- Child Protection Helpline. 132 111.
- Kids Helpline. Free, private, and confidential, telephone and online counselling service specifically for young people aged between 5 and 25 in Australia. Call 1800 551 800 for help.
- Australian Childhood Foundation. 1800 176 453/ 03 9874 3922. Counselling for children and young people affected by abuse.

Disclaimer

This document includes general information about the Group and its activities as at the date of this document. It is given in summary form and is therefore not necessarily complete. It is not intended that it be relied upon as advice. You should seek your own independent professional advice depending on your specific investment objectives, financial situation or particular needs.

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This document contains statements that constitute "forward-looking statements" within the meaning of Section 21E of the US Securities Exchange Act of 1934. Forward-looking statements are statements about matters that are not historical facts. These include statements regarding our current intent, belief or expectations with respect to our business and operations. We use words such as 'will', 'may', 'expect', 'indicative', 'intend', 'seek', 'would', 'should', 'could', 'continue', 'anticipate', 'believe', 'probability', 'risk', 'aim', 'target', 'plan', 'estimate', 'outlook', 'forecast', 'goal', 'guidance', 'ambition' 'assumption', 'projection', or other similar words that convey the prospective nature of events or outcomes and generally indicate forward-looking statements. Such statements reflect our current best estimates, judgements, assumptions and views as at the date of this document with respect to future events and are subject to change, certain known and unknown risks and uncertainties and assumptions and other factors which are, in many instances, beyond the control of Westpac, its officers, employees, agents and advisors, and have been made based upon management's current expectations, understandings or beliefs concerning future developments and their potential effect upon us. There can be no guarantee or assurance that future developments or performance will be in accordance with our expectations or that the effect of future developments on us will be those anticipated.

Except where contrary to law, Westpac and its related entities exclude liability for the accuracy or completeness of this information, whether as a result of new information, future events or results or otherwise. Except as required by law, we assume no obligation to update the information contained in this document, whether as a result of new information, future events or otherwise after the date of this document.

ACCESSIBILITY SUPPORT

Westpac welcomes calls through the National Relay Service. If you are deaf, hard of hearing, or have speech/communication difficulty, choose your access option detailed on the [National Relay Service](#).

Where English is a second language, contact us and a banker can arrange a language interpreter.

Visit [Westpac Access and Inclusion](#) for further information on our more accessible products and services for people with disability, who are neurodivergent or where English is a second language.

Contact us

For questions and comments,
please contact Westpac Group Sustainability



sustainability@westpac.com.au



westpac.com.au/sustainability