

WESTPAC HUMAN RIGHTS GRIEVANCE MECHANISM



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About

Westpac's approach to grievance and remedy is outlined in our **Human Rights Position**.

We have created the Human Rights Grievance Mechanism (**Mechanism**) to provide a channel for an affected person or people to raise concerns if they consider their human rights have been or could be adversely affected by a loan provided to a current or former **large business customer**.

The Mechanism is designed to support appropriate dialogue between an affected person or people, Westpac and our customers, and to help provide and participate in remedy where appropriate. Our approach is guided by international standards such as the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the framework set out in the Organisation for Economic Co-operation and Development (OECD) Guidelines.

We have engaged with a range of external and internal stakeholders to help identify gaps and opportunities as we developed this Mechanism. It will operate as a pilot for two years from May 2026 – 2028, during which we will seek feedback and review submitted cases to refine and improve the process.

Note: If your concern does not fall within the scope of this Mechanism, you can still raise it through our **Complaints and Compliments** page on our website.

How does the Mechanism work?

The phases below outline what is involved in submitting and resolving a grievance with Westpac Group. We aim to make the process transparent, fair, and respectful for all parties involved. The timeframes are indicative and may change in certain circumstances¹.

Phases	Timing	Description
Receive and acknowledge grievance	Within 5 business days	You can submit a grievance by completing a Westpac grievance submission form and emailing sustainability@westpac.com.au . Other ways to get in touch are available on our Complaints and Compliments page . We will acknowledge we have received your grievance within 5 business days.
Assess grievance	2 months	We will assess the grievance to determine if it meets our eligibility criteria. Where a grievance is eligible but there are significant barriers to our ability to investigate, we may decide not to progress it into the Mechanism for further investigation. We will notify the complainant(s) of the outcome of the assessment within 2 months.
Investigate grievance	6 months	Grievances that progress into the Mechanism will be investigated to gather more information and consider our connection to the alleged adverse human rights impact (if any) in line with our Human Rights Position.
Engage in dialogue and consider resolution	6-10 months	Based on the findings of our investigation and any confidentiality or other legal limitations, we will engage in dialogue with the complainant(s) and customer (if they agree to participate in dialogue) with the aim of reaching a mutually acceptable resolution of the grievance. In some cases, we may engage an independent facilitator to assist. Dialogue may involve discussions regarding grievance resolution with the complainant(s), including any remedy, and encourage the customer to prevent, mitigate or remedy the alleged impacts. Where we identify that we have contributed to an adverse human rights impact, we will also follow a similar approach in line with our Human Rights Position.
Monitor and learn	Ongoing	We will monitor any agreed resolution reached. We will also consider lessons learnt for Westpac from the process and identify potential opportunities for improvement.
Report	Annual	At least annually, we will publish key data related to the Mechanism, having regard to complainant and customer confidentiality and privacy.

¹ For example where further information is needed to understand a grievance and/or where translation is required. If a timeframe changes, we will inform all relevant parties. Complainants may contact Westpac at any time.

Human Rights Grievance Mechanism Process

Submit a grievance

1. Complete a  [Westpac grievance submission form](#) and email sustainability@westpac.com.au
2. Other ways to get in touch are available via our [Complaints and Compliments page](#).
3. If a grievance is submitted to another Westpac complaints channel but falls within the scope of this Mechanism, it will be referred to this Mechanism and the complainant(s) will be notified promptly.
4. We will take reasonable steps to protect the complainant(s)' confidentiality and privacy unless they agree otherwise. We do not tolerate retaliation against anyone who uses this Mechanism and expect the same from our customers.

Eligibility of a grievance

5. A grievance will be eligible under the Mechanism where:
 - 5.1 it relates to an alleged actual or potential adverse impact on an internationally recognised human right;
 - 5.2 it is submitted by an affected person or people or their legitimate or recognised representative(s) (also referred to as the 'complainant(s)'); and
 - 5.3 the alleged actual or potential adverse human rights impact is connected to a loan provided to a current or former [large business customer](#).
6. A grievance will not be eligible under the Mechanism if:
 - 6.1 the complainant's conduct is considered by Westpac to be **vexatious**; or
 - 6.2 the issues it raises are subject to another external complaint or grievance process (e.g. a formal procedure or system outside this Mechanism that is designed to handle complaints or disputes) or require referral to authorities (e.g. because they involve or may involve criminal matters), and it would not be appropriate or useful for this Mechanism to consider the grievance.
7. Where a grievance is eligible but there are significant barriers to our ability to investigate, we may decide not to progress it into the Mechanism or may choose to apply only parts of the Mechanism. Examples of significant barriers include insufficient information provided by a complainant to understand the grievance; no records from the time the issue occurred; an inability to obtain information or records from third parties; a customer does not consent to us disclosing our lending relationship to a complainant or the risk of reprisals to alleged victims if their identity is disclosed.
8. If our lending relationship with a customer connected to the grievance is not publicly known and our customer has not consented to us disclosing our lending relationship to the complainant(s), we may not be able to communicate with complainant(s) about any of the following matters:
 - 8.1 why the grievance has not progressed into the Mechanism;
 - 8.2 whether we will conduct a confidential internal investigation;
 - 8.3 the progress of any investigation; and/or
 - 8.4 the outcomes of any investigation.
9. This is because communications of this nature may imply the existence of a lending relationship which is confidential and which we do not have permission to disclose. In these circumstances we:
 - 9.1 will seek to use (or build) our **leverage** to encourage the customer to provide consent so we can investigate the grievance;
 - 9.2 may conduct a confidential internal investigation of the grievance; and/or
 - 9.3 respond to the findings of any confidential internal investigation which may include:
 - 9.3.1 assessing our connection to any adverse human rights impacts in line with our Human Rights Position; and
 - 9.3.2 assessing our relationship with the relevant customer.

Investigate a grievance

10. Where we have informed a complainant(s) that a grievance has progressed into the Mechanism, we will investigate it. This will involve gathering and reviewing information to better understand the grievance and considering our connection to the alleged adverse human rights impact.

Engage in dialogue

11. Following completion of the investigation, we may engage in dialogue with the complainant(s) and customer (if the customer agrees to participate). The aim of dialogue is to reach a mutually acceptable resolution of the grievance. In some situations, we may engage an independent facilitator to facilitate the dialogue.
12. Dialogue may involve discussions regarding appropriate remediation. Where we identify an adverse human rights impact, we may use (or build) our leverage to encourage our customer to provide for or cooperate in remediation and take appropriate action in line with our Human Rights Position.
13. Where we identify that we have caused or contributed to an adverse human rights impact, we will provide for or cooperate in remedy in line with our Human Rights Position. Remedy may involve – but is not limited to – actions such as restoring what was lost, financial or non-financial compensation, support for recovery, satisfaction and/or guarantees to prevent it from happening again or a combination of these.

Monitor and learn

14. If the parties reach a mutually acceptable resolution to a grievance, we will monitor how it is implemented. Whether or not a resolution is reached, we will also review the process to identify any lessons learned and consider improvements to this Mechanism.

Report

15. At least annually, we will report on the following and in doing so, we will respect the complainant(s)' and customer's confidentiality and privacy and consider any potential risks to the complainant(s):
 - 15.1 Number of grievances received.
 - 15.2 Number of grievances that progressed into the Mechanism.
 - 15.3 Number of grievances that did not progress into the Mechanism.
 - 15.4 General anonymised descriptions of grievances, their status and outcomes if any.
 - 15.5 Industry/sector to which the grievance applies.

Governance

16. Westpac's Chief Sustainability Officer (CSO) is accountable for grievance handling under this Mechanism.
17. The CSO is supported by Westpac's Human Rights and Social Policy team, which is responsible for the day-to-day operations of the Mechanism, along with a cross-functional group of Westpac employees. The CSO will escalate grievances to relevant internal governance bodies, as appropriate.
18. The day-to-day management of our approach to human rights related matters, including grievance and remedy, is the responsibility of the Westpac CEO and is delegated to the CSO, Group Executives and senior management where relevant.

Glossary

Term	Definition
Adverse human rights impact	A situation that causes harm to a person or group, where the harm removes or reduces their ability to enjoy their internationally recognised human rights.
Complainant	A person or group of people who believe that their internationally recognised human rights may have been or have been adversely impacted by a Westpac large business customer. This may also include a legitimate representative acting on their behalf.
Large business customer	This typically excludes smaller businesses with an exposure below AUD\$3 million in Australia. Where a grievance relates to a former customer, practical challenges may be faced during the Mechanism's process (e.g. access to relevant documents). Westpac New Zealand customers are not included in the scope of this Mechanism. ²
Leverage	The legitimate influence that a business has over another entity (or entities) to encourage it to take action to prevent and address adverse human rights impacts.
Vexatious	A grievance that is made without reasonable grounds or is made in a way to harass or annoy, cause delay or detriment, or achieve a wrongful purpose.

Frequently asked questions

What types of grievances can be submitted?

Grievances can be about adverse human rights impacts. This occurs when an action or failure to act takes away a person's or group's ability to enjoy their internationally recognised human rights. This may include, for example, impacts related to health; safe and healthy working conditions; life, liberty and security of person; an adequate standard of living; taking part in cultural life; freedom from discrimination; freedom from forced labour or child labour; property; cultural heritage; and a clean, healthy and sustainable environment.

What support will be provided to help complainants to participate in the grievance process?

Where a complainant requires specific support to participate in the Mechanism's process (e.g. translation services), Westpac will consider these requests on a case-by-case basis.

When may an independent facilitator be engaged?

Westpac may engage an independent facilitator to assist including in situations where a grievance involves complex issues that require specific human rights expertise. An independent facilitator can be appointed before dialogue commences or during the dialogue process. It must be someone that all parties agree to. Westpac will bear the costs of the independent facilitator.

What does the pilot phase of the Human Rights Grievance Mechanism entail?

The pilot phase consists of a period of two years from May 2026 – 2028 and is designed to test and refine our approach and scope. It will be evaluated after the first and second years of the pilot and will determine the potential future direction of the Mechanism.

² We will undertake a review of the Mechanism's scope in FY27 to assess the potential for including additional business units.



Westpac acknowledges the Traditional Owners as the custodians of this land, recognising their connection to land, waters and community. We pay our respects to Australia's First Peoples, and to their Elders, past and present.

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