



**AUSWIDE**  
— B A N K —

# WHISTLEBLOWER PROTECTION

WHISTLEBLOWER PROTECTION POLICY  
Current at May 2024

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## **1. WHISTLEBLOWER PROTECTION POLICY**

### **1.1 Why does Auswide Bank have this policy?**

Auswide Bank has a strong values-based culture that encourages the highest standards of openness, integrity, honesty and accountability. We encourage an open culture in our dealings between our managers, employees and all people with whom we engage in the course of our business.

The Corporations Act in Australia requires Auswide to protect whistleblowers.

The purpose of the Auswide Whistleblower Protection Policy is to encourage, support and promote honest and ethical behavior by providing a framework for the escalation of 'Wrongdoing'.

### **1.2 What is 'Wrongdoing'**

Examples of 'Wrongdoing' include, but are not limited, to the following:

- Any failure to comply with a legal obligation or regulatory requirement;
- a breach of Auswide Bank's policies and procedures;
- dishonest or corrupt behaviour, including soliciting, accepting or offering a bribe or other such benefits;
- fraudulent or dishonest activity;
- illegal activity (including theft, drug sale/use, violence or threatened violence and property damage);
- improper behaviour relating to reporting, accounting, internal accounting controls, actuarial or audit matters;
- a serious impropriety;
- conduct endangering or placing at risk the health or safety to other persons;
- a substantial mismanagement of Bank's resources;
- conduct that is detrimental to financial position or reputation of the Bank; and
- concealment of any information that reveals any of the above matters of any other reportable conduct.

### **1.3 How does this Policy apply at Auswide**

This Policy applies to all Auswide Bank Business units. It applies to everyone working at Auswide Bank, whether or not they are Auswide employees, and extends to third party vendors and service providers to Auswide Bank.

It allows directors, managers, employees, contractors and consultants to make a report and requires Auswide to protect them from being victimised as a consequence.

Under the Policy, complaints/disclosures are made by contacting any one of the designated Whistleblower Protection Officers (WPOs).

## **1.5 Whistleblower Protection Officer (WPO)**

Auswide has three WPOs – the Chief People & Property Officer, the Chief Risk Officer and the Managing Director. Any staff member can seek advice from the WPO prior to or after making a report.

The WPO can protect the Whistleblower in a number of ways including, but not limited to, the following:

- ✓ Ensuring confidentiality in the investigation.
- ✓ Protecting, as far as legally possible, the staff member's 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 business unit.

## **1.6 Investigating Wrongdoing**

Investigation of Wrongdoing will be conducted in a manner that is confidential, fair and objective. The investigation processes will vary depending on the nature of the Wrongdoing and the amount of information provided.

For a report to be investigated, it must contain sufficient information to form a reasonable basis for investigation. A staff member reporting anonymously, should provide as much information as possible so as not to compromise the ability to fully investigate the report.

A Whistleblower will always be informed of the outcome of the investigation. In cases where the Whistleblower investigator has not substantiated the allegations, an appropriate explanation will be made to the Whistleblower, subject to any privacy and confidentiality rights.

## **1.7 Reporting & Governance**

Reports will be provided regularly to the Board Risk Committee. Matters are referred to the Board Audit Committee where relevant e.g. matters relating to accounting, internal control or audit concerns.

This policy is reviewed annually and whenever there are significant regulatory changes of business needs.

A breach of the Policy may, in some circumstances, result in disciplinary action.