

Whistleblower Policy

Version 5
December 2023

I. BACKGROUND AND PURPOSE

ANZ Staff Superannuation (Australia) Pty Limited (**ANZ Staff Super or alternatively the Trustee**) has a strong values based culture that encourages openness, integrity and accountability, enabling our people to succeed together and deliver what matters.

ANZ Staff Super's Whistleblower Policy has been developed so that you can freely and without fear of detriment raise concerns regarding situations where you believe that ANZ Staff Super, or anyone connected to ANZ Staff Super, has acted in a way that constitutes misconduct (as set out below).

This Policy explains how you can report such concerns, how they will be investigated, what you can expect, and other sources of information that may be helpful to you in reporting your concern.

This Policy will be made available on ANZ Staff Super's public website.

II. PRINCIPLES

1. Speak Up and Report It! – Before raising your concern under this policy, please consider whether you would prefer to report your concern via another channel, such as to your line manager.

2. Protection from Detrimental Conduct – ANZ Staff Super will not tolerate detrimental conduct, that causes or is intended to cause harm to you because of the fact that you or someone else has made or intend to make, or are suspected as having made a report (or because you or someone else might or could make a report). ANZ Staff Super will take reasonable measures to protect you, as well as individuals conducting, assisting or participating in an investigation from detriment.

3. Confidentiality and Consent – ANZ Staff Super will maintain confidentiality of all reports made under this Policy and your identity as a reporter to the fullest extent possible. While ANZ Staff Super encourages you to identify yourself to the Whistleblower Program by giving consent, you can still report on an anonymous basis.

4. ANZ Staff Super's Expectations of You – ANZ Staff Super expects you to act honestly and ethically, and to make a report on reasonable grounds.

5. Investigations and Outcomes - All investigations will be conducted in a timely manner, in accordance with the principles of fairness and natural justice and appropriately documented. Where possible, ANZ Staff Super will update you on the status and outcomes of your report.

6. Higher Standard - This Policy is designed to comply with ANZ Staff Super's legal obligations. If anything in this Policy is inconsistent with any law imposed on ANZ Staff Super, that legal obligation or the "higher standard" will prevail over this Policy.

7. Regulators – You have the right to communicate with regulators and law enforcement authorities at any time in relation to your concerns or any matter relating to this Policy.

Some of these Principles are further explained throughout this Policy.

III. SCOPE

A. CAN I MAKE A REPORT UNDER THIS POLICY

You can make a report under this Policy if you are a current or former:

- a) employee of ANZ Staff Super;
- b) a person who is providing, or has provided goods or services to ANZ Staff Super, whether paid or unpaid (e.g. volunteering), and this includes contingent workers and suppliers;
- c) employee or a sub-contractor of a person identified in (b) above;
- d) an officer or an associate of ANZ Staff Super, for example, a director or secretary of ANZ Staff Super or of a related body corporate of ANZ Staff Super; or
- e) a relative or dependant of any of the individuals identified at (a) to (d) above (or a dependant of such an individual's spouse); and
 - i your concern is not one of the Excluded Matters outlined below;
 - ii you do not feel safe or comfortable to raise your concern via ANZ Staff Super's other reporting channels; and
 - iii you have a reasonable and genuine concern about actual or suspected misconduct within or by ANZ Staff Super, or anyone at or connected with ANZ Staff Super.

Examples of what might constitute misconduct include:

1. breaches of ANZ Staff Super's Code of Conduct;
2. practices or behaviours of concern relating to compliance with policies, procedures, or the law (i.e. including anything you think may be illegal);
3. unethical or unprofessional behaviour;
4. issues of honesty or integrity, including internal fraud, theft, bribery and corruption;
5. conflicts of interest, including those relating to outside business interests, relationships, improper payments and donations;
6. breaches of privacy or confidentiality, including in relation to Trustee and member information;
7. breaches of competition law;
8. actual or potential breaches of modern slavery legislation and/or human rights standards;
9. concerns that pose a risk to public safety, or the stability of, or confidence in the financial system;
10. misconduct or an improper state of affairs or circumstances (may include, but is not limited to, business behaviour and practices that cause consumer harm or systemic issues) in relation to ANZ Staff Super generally, including the tax affairs of ANZ Staff Super; and
11. a practice or behaviour of concern that relates to your current or past employment with ANZ Staff Super that has significant implications for ANZ Staff Super, presents a danger to the public or financial system, or otherwise is a breach of law.

B. EXCLUDED MATTERS

While everyone is encouraged to speak up and report any concerns to ANZ Staff Super, not everyone nor all types of concerns are intended to be covered by this Policy. Examples of the matters that are generally not intended to be covered by this Policy are:

Exclusion 1: Member Complaints

If you are a member and are concerned with the way ANZ Staff Super has handled any matter, product, or service, including an existing complaint, please contact ANZ Staff Super with your concern via phone, email or post:

Inquiries and Complaints Officer
ANZ Staff Super
GPO Box 4303
Melbourne VIC 3001

Ph: 1800 000 086

Email: anzstaffsuper@superfacts.com

Exclusion 2: Personal Work-related Grievances

If you are a current or former employee of ANZ Group Holdings Limited (**ANZ Group**) and want to report a grievance that directly affects you personally (and only you) in the context of your current or past employment, please contact ANZ Group's Employee Relations team via [PeopleHub](#). Examples may include: an interpersonal conflict between you and another employee, a decision relating to your employment, transfer or promotion, a decision about the terms and conditions of your employment, and a decision to suspend or terminate your employment or otherwise discipline you based on your conduct, behaviour or performance. These matters are excluded from the Policy as, generally speaking, they are not matters that the Whistleblower laws are intended to protect, unless they have broader implications for ANZ Staff Super (as described in example 11 above) or they relate to detrimental conduct.

In addition, ANZ Group has other dedicated processes in place available to employees through which it may be more appropriate to report a particular concern. Please refer to Principle 1 above.

IV. HOW DO I MAKE A REPORT OR FIND OUT MORE INFORMATION ABOUT THE PROCESS?

You can find out more information about the reporting process, or make a report via our external online service as described below. Whichever method you choose, a Whistleblower Protection Officer will be assigned to your report and will work with the Whistleblower Program Team to assess your report and arrange for an investigation, if appropriate. For further information on the roles and responsibilities of these individuals, please see Part VIII below. The different ways you can make a report or find out more information, are:

Whistleblower Protection Officer (WPOs): You can contact a WPO directly to make a report. A WPO is an individual within ANZ Group who has specific responsibilities under this Policy including protecting those who make a report and undergo role-specific training on these responsibilities. In all cases, a WPO will be assigned to your report so that it is assessed and where appropriate, investigated.

WPOs include certain senior leaders and individuals within ANZ Group with appropriate skills and expertise to discharge their responsibilities under the Policy, including the ANZ Group Chief Compliance Officer, Group General Manager Internal Audit, and Whistleblower Program Lead. A current list of WPOs can be found [here](#).

Deloitte: You can make a report through ANZ Staff Super’s External Whistleblower Reporting Service which is managed by Deloitte. You can make a report (including an anonymous report) via:

Website: www.ANZStaffSuper.deloitte.com.au | Username: ANZ Staff Super

Hotline: Australia: ☎ 1800 997 448 (Toll Free) | New Zealand: ☎ 0800 376 325 (Toll Free) | Other International: ☎ +61 3 9667 3731

Postal mail: ANZ Staff Super Whistleblower Service
Reply Paid 12628
A’Beckett Street
Melbourne VIC 8006

Other Eligible Recipients (OER): There are other individuals who are also eligible to receive reports on behalf of ANZ Staff Super and who are required to handle that information in accordance with this Policy. This include officers of ANZ Staff Super, an auditor (or a member of an audit team) conducting an audit of the Scheme, an actuary of the Scheme and any other person authorised by the Trustee of the Scheme to receive reports. Ultimately all reports received by OERs internal to ANZ Staff Super will be referred to a Whistleblower Protection Officer and the Whistleblower Program Team unless there are exceptional circumstances. ANZ Staff Super therefore recommends that you make your report using one of the other methods outlined above.

Additional support for ANZ Group Employees: For ANZ Group employees and their immediate families, who have made a report, or are thinking about making a report, and wish to seek additional support, the **Employee Assistance Program (EAP)** provides free, confidential, short term wellbeing support services by qualified professionals face to face, over the phone or over the internet. The program consists of a number of services which can be found [here](#).

Additional support for non-employees: For non-employees based in Australia, who have made a report, and wish to seek additional support, the **ANZ Whistleblower Support Program** provides free, confidential, short term wellbeing support services 24/7 by qualified professionals over the phone on this toll free number: 1300 916 539.

V. WHAT ARE MY PROTECTIONS UNDER WHISTLEBLOWER LAWS?

ANZ Staff Super applies the standards under this Policy, however this does not extend to providing independent legal advice as to the application of the law and protections under the law for your specific circumstances. If you require further information regarding the application of the law, we encourage you to seek independent legal advice.

VI. WHAT IF MY CONCERNS RELATE TO CONDUCT, PEOPLE OR OPERATIONS OUTSIDE OF AUSTRALIA?

You can make a report regardless of where you are or where the conduct is occurring. If your report concerns conduct, people, or operations located outside of Australia, there may be some specific requirements, depending on which jurisdiction is involved.

VII. I HAVE MADE A REPORT UNDER THIS POLICY. WHAT NEXT?

A. PROTECTION FROM DETRIMENTAL CONDUCT (PRINCIPLE 2)

ANZ Staff Super's protection for whistleblowers

ANZ Staff Super does not tolerate any detriment that is inflicted on you because of the fact that you or someone else has made a report, or due to someone suspecting that you or someone else might make a report, regardless of whether you have or are intending to do so. ANZ Staff Super will take all reasonable steps to protect you from detrimental conduct and will take appropriate action where such conduct is identified. Examples of what may be considered detrimental conduct include:

- a) retaliation, dismissal, suspension, demotion, or having your engagement with ANZ Staff Super otherwise terminated;
- b) harassment, threats or intimidation;
- c) discrimination, being subjected to current or future bias, or derogatory treatment;
- d) injury or harm, including psychological harm;
- e) damage or threats to your property, business, financial position or reputation;
- f) revealing your Identity as a Whistleblower without your consent or contrary to law; or
- g) threatening to carry out any of the above actions.

These protections apply to you regardless of whether any concerns raised in a report are substantiated, provided that you are acting honestly and ethically and made the report on reasonable grounds. These protections also apply to individuals conducting, assisting or participating in an investigation.

If someone at ANZ Staff Super, including any supplier to ANZ Staff Super, engages in detrimental conduct against you, please **immediately** contact your Whistleblower Protection Officer, the Whistleblower Program Lead or the Whistleblower Program Team, either directly or through ANZ Staff Super's external whistleblower reporting service managed by Deloitte (contact details above). This includes where you have felt you:

- are disadvantaged or have suffered detriment because of the fact that you or someone else has made a report, or due to someone suspecting that you or someone else might make a report or because someone believes you have or may make a report;
- are disadvantaged or have suffered detriment for participating in or assisting an investigation; or
- have any concerns regarding your safety for having made a report or in considering making a report.

Where the detrimental conduct against you involves the Whistleblower Protection Officer, you should report the matter to the Whistleblower Program team or the Chair of the ANZ Staff Super Governance and Audit Committee.

It is very important that you report any such detriment immediately, as it will help ANZ Staff Super better protect you to the fullest extent possible. Reports of detrimental conduct will be treated confidentially. Anyone engaging in detrimental conduct may be subject to serious consequences, including disciplinary action and/or termination of engagements or contracts, as applicable. They may also be subject to legal consequences in the form of civil and criminal penalties.

It is important to note that ANZ Staff Super views the misuse of the whistleblower channel seriously and a disclosure that is deliberately dishonest could give rise to disciplinary or other action.

Protections under Australian whistleblower laws

If you make a report under this Policy, or to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA) or the Commissioner of Taxation you may also have the benefit of the statutory protections that apply to whistleblowers under corporate and tax whistleblowing laws.

Those protections include:

- protection from civil, criminal or administrative legal action (including disciplinary action) for making a report;
- no contractual or other right can be enforced against you because you made a report (for example, you cannot have your employment agreement terminated for making a report);
- in some circumstances, protection from having to give evidence in legal proceedings or having evidence used against you in criminal proceedings; and
- compensation or some other legal remedy if you have suffered detriment because of someone else's belief or suspicion that you have made a report.

For further information about the statutory protections for whistleblowers please see: <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/>.

B. CONFIDENTIALITY AND CONSENT (PRINCIPLE 3)

When you make a report under this Policy or shortly after, ANZ Staff Super will seek your consent in relation to how you would prefer information about your identity, including any information that is likely to identify you, to be handled (hereinafter, all such information will be referred to as your **Identity**). More information will be provided when you make a report, but in general terms, you can select one of three options below for protecting your Identity. Regardless of the option you choose, ANZ Staff Super will keep information in relation to your Identity and your report confidential to the fullest extent possible:

Confidential - this means that you consent to the Whistleblower Protection Officer and Whistleblower Project Team knowing your Identity and for the Whistleblower Protection Officer and Whistleblower Program Team to disclose your Identity for the purposes of investigating, and for reporting to relevant stakeholders (e.g. a Whistleblower Investigator or an internal lawyer). This is the preferred option because ANZ Staff Super will be best placed to fully investigate the matter, and provide you with ongoing protection and support. Practical steps ANZ Staff Super may take to protect confidentiality may include, but are not limited to:

- referring to a reporter using gender neutral language;
- removing information that might lead to the identity of a reporter from written material; or
- consulting with a reporter in relation to any further measures that might be taken in order to maintain confidentiality.

Partially Anonymous - this means that you have consented to only the Whistleblower Protection Officer and Whistleblower Program Team knowing your Identity. While this approach is possible, it may create some limitations for investigative purposes which the Whistleblower Program Team can talk to you about.

Anonymous - this means you haven't identified yourself to ANZ Staff Super, the Whistleblower Program Team or the Whistleblower Protection Officer. You can choose to remain anonymous at the time of making a report, over the course of the investigation and after the investigation is finalised. You can refuse to answer questions that you feel could reveal your Identity at any time, including during follow-up conversations and you can omit information from your report that you are concerned may reveal your Identity.

ANZ Staff Super welcomes anonymous reports when you are not comfortable to disclose your Identity, but they can present some challenges, as ANZ Staff Super may not be able to seek further information from you, update you, and in some circumstances, it could be difficult to investigate the matter fully or even at all. Knowing your Identity may assist ANZ Staff Super to investigate the matters you have raised, improve the effectiveness of the investigation and enable ANZ Staff Super to communicate, support and protect you better. For these reasons, if you wish to remain anonymous it is important that you maintain ongoing communication with ANZ Staff Super either via the Whistleblower Program Team, the Whistleblower Protection Officer or the Deloitte service so ANZ Staff Super can ask follow-up questions, provide support or provide feedback on any investigation challenges and provide updates.

If you make an anonymous report, ANZ Staff Super will protect you in the following ways:

- maintaining communication through anonymous telephone hotlines and anonymised email addresses;
- limiting any interviews to phone interviews and information gathering to email or via the Deloitte service, as appropriate and only where you have consented; and
- not taking deliberate steps to identify you during an investigation.

Note that for legal and regulatory reasons, where your Identity is known, ANZ Staff Super may need to disclose your Identity to lawyers, regulators and or law enforcement authorities, regardless of the level of consent you have provided. In some cases, ANZ Staff Super may also need to disclose information likely to identify you where it is reasonably necessary for the purposes of an investigation and where reasonable steps have been taken to protect your Identity.

To help protect you and your Identity, please don't share details of the matter, your report, or what ANZ Staff Super tells you with others outside of the Whistleblower Program Team. Of course, you have the right to communicate with regulators and law enforcement authorities at any time (see Principle 7 in Part II above).

C. INVESTIGATION AND OUTCOMES (PRINCIPLE 5)

After receiving a report from you, ANZ Staff Super will:

- Assign a Whistleblower Protection Officer to your report;
- Assess your report to determine if it will be managed under this Policy;
- Determine whether and how to investigate;
- Consider any conflicts of interest prior to investigating;
and
- Appoint a Whistleblower Investigator if appropriate.

For each report received, the Chair of the Governance and Audit Committee of ANZ Staff Super will appoint an independent person to act as the Whistleblower Protection Officer (WPO) for that case. A WPO is a person within ANZ Staff Super who has particular responsibilities under this Policy, including protecting the interests of reporters (for further information see Part VII below). If the report concerns the conduct of the Chair of the Governance and Audit Committee, the Chair of the Board will appoint the WPO.

Whistleblower Investigators are predominantly from ANZ Group's Group Integrity and/or Employee Relations teams but may include others with the appropriate skills and subject matter expertise where required. Whistleblower Investigators are briefed on your report and their confidentiality obligations. Investigations are to be conducted in a timely, fair and impartial manner, and investigators are required to act independently and competently and to treat all those involved in a report fairly so that each case is evaluated on its merits. ANZ Staff Super will ensure the fair treatment of individuals mentioned in reports by handling reports under this Policy confidentially and sensitively. Where appropriate, individuals who are accused of misconduct in a report (a **Respondent**) will have an opportunity to respond to allegations before any adverse findings of fact in any investigation are made and, for Employee Respondents, before any disciplinary action (if appropriate) is taken.

If you make a report about a matter that has already been investigated by or on behalf of ANZ Staff Super, (for example by Employee Relations or Group Integrity) the Whistleblower Program Team will assess the report to determine if further investigation is necessary.

The Whistleblower Investigator may need to contact you for further information for the purpose of the investigation and, where necessary and subject to confidentiality obligations, may also need to speak to other individuals who may have relevant information regarding the matters reported. If you have not provided your consent to be contacted, or if you decline or can't provide further information, this may affect ANZ Staff Super's ability to investigate the matter fully, and in some circumstances, could mean that an investigation is not possible. We will endeavour to let you know if this is the case. The method for documenting and reporting the findings of any investigation will depend on the nature of the report. The report and any investigation records will be securely retained.

For investigated reports, the Whistleblower Program Team or the Whistleblower Investigator will provide you with updates on progress and any investigation outcomes, where appropriate and subject to any confidentiality constraints. These updates may be written or verbal, depending on the circumstances. There may be circumstances where it is not appropriate to provide details of the outcome of the investigation to you.

If you have made a report anonymously, it is very important that you check back in on your report from time to time, as ANZ Staff Super may have left messages for you in an attempt to update you on the investigation, or to let you know what further information is needed that may be critical to progressing the investigation.

Each report will have a unique identifier which will be provided to you so you can liaise with Deloitte or the WPO assigned to you in order to seek feedback on the status or outcome of your report.

If you are not satisfied that your report has been investigated and acted upon appropriately, you may contact the Chair of the Governance and Audit Committee of ANZ Staff Super to request a review. Where a request to review a report is made and the WPO assigned to the report is the Chair of the Governance and Audit Committee of ANZ Staff Super, the review will be conducted by the Chair of the Board.

VIII. ROLES AND RESPONSIBILITIES

The following lists some details of the main responsibilities of some of the key positions and teams mentioned in this Policy and what you can expect from them throughout the process:

A. WHISTLEBLOWER PROTECTION OFFICER (WPO)

- Maintain confidentiality of Identity and reports received to the fullest extent possible and as required by this Policy and the law
- Immediately report concerns in relation to any detrimental conduct to the WP Team
- Oversee the investigation of reports assigned to them and ensure investigations are conducted in accordance with this Policy
- Update reporters on report progress and outcomes as appropriate in the circumstances
- Be satisfied that appropriate recommendations to act or remediate based on the WI's investigation report have been made in conjunction with other stakeholders, where appropriate
- Make recommendations to prevent future instances of reportable misconduct
- Complete any mandatory training
- Seek to ensure the integrity of the Whistleblower Program is maintained.

B. WHISTLEBLOWER PROGRAM LEAD

- Comply with responsibilities for Policy Owners under the [Conduct Risk Framework](#) and Policy Governance Framework
- Develop, maintain, and communicate obligations under this Policy
- Oversight implementation and effectiveness of this Policy across the ANZ Group and ensuring implementation is appropriately supported
- Oversight compliance with requirements under this Policy
- Review and approve related level 3 Whistleblower Policies and/or jurisdiction-specific Policy schedules, including any amendments, in line with the Policy Governance Framework
- Approve any exemptions in relation to this Policy or any related level 3 Whistleblower Policies.

C. WHISTLEBLOWER PROGRAM TEAM (WP TEAM)

- Maintain confidentiality of Identity, reports and investigations to the fullest extent possible and in accordance with this Policy and the law
- Act as WPOS on certain whistleblower matters
- Determine whether a report falls within the scope of the Policy
- Determine whether a report should be investigated and appoint a WI where appropriate
- Assist the WPO, where applicable, in complying with their responsibilities listed above, including the assessment and oversight of reports
- Provide advice and support to Other Eligible Recipients
- Maintain a secure and restricted record of all reports made under this Policy
- Report to the Trustee, the Board of ANZ Staff Super and any committees of ANZ Staff Super in a manner agreed between the Whistleblower Program and the Trustee, Board and any relevant committee from time to time
- Assist ANZ Staff Super with role-specific training as and when required
- Assist ANZ Staff Super to conduct an annual review of this Policy so that it remains effective
- Provide support and updates to reporters on the progress of a matter and outcomes where possible and appropriate
- Provide advice, where appropriate, to first line Risk Owners and to Business Governance and Controls.

D. WHISTLEBLOWER INVESTIGATORS (WI)

- Maintain confidentiality of Identity, reports and matters they are investigating to the fullest extent possible and in accordance with this Policy and the law
- Immediately report concerns in relation to any detrimental conduct to the nominated WPO and the WP Team
- Investigate reports in accordance with their appointment and this Policy
- Plan the investigation of matters relating to the report and (within the period agreed with the WP Team) advise the WP Team and WPO of the proposed investigation approach
- Advise the WP Team and WPO if, at any time, immediate consideration or action is required to stop, prevent or mitigate the reported misconduct or any other identified concerns
- Take steps to protect or preserve evidence such as documents, materials and equipment
- Gather documents, information and evidence relating to the matters being investigated
- Provide regular updates to the WP Team and WPO on investigation progress as required by the WPO
- Draw conclusions based on an objective and fair assessment of the evidence gathered during the investigation
- Maintain comprehensive records of the investigation
- Make recommendations to the WP Team and WPO, where appropriate, in relation to any disciplinary actions or contractual actions with respect to any respondent(s) and how to stop, prevent or mitigate future misconduct
- Complete any mandatory training.

E. OTHER ELIGIBLE RECIPIENTS (OER)

- Receive reports and obtain consent from the reporter where possible or relevant and refer the report to the WP Team for assessment and, if appropriate, investigation
- Maintain confidentiality about reports they receive in accordance with this Policy and any subsequent investigation
- Immediately report any concerns in relation to any detrimental conduct to the nominated WPO and the WP Team
- Complete any training mandated by ANZ Staff Super and/or the WP Team.

IX. OTHER INFORMATION ABOUT THIS POLICY

A. BREACH OF THIS POLICY

A breach of this Policy must be immediately escalated to the Chair of the Governance and Audit Committee, and could be a breach of the ANZ Staff Super Code of Conduct, and may have serious consequences including termination of employment, engagement or services, where appropriate.

B. LEGAL OBLIGATIONS

If, in performing duties under or otherwise complying with this Policy, you identify a legal obligation that is inconsistent with this Policy, you must report the inconsistency to the Policy Owner.

C. EXEMPTIONS TO THIS POLICY

All policy exemption requests must be submitted for approval to the Governance and Audit Committee. Approvals will not be granted for exemptions from this policy that do not comply with applicable laws. Exemptions will not be granted on a retrospective basis.

D. APPLICATION

This policy applies to everyone who works at or with ANZ Staff Super including in the supply of goods and services.