



Whistleblower Standard

Bank of Queensland Limited

Approver

Board

Owner

Board

Functional Owner

Group Executive, People & Culture

Hierarchy Classification

Level 1a

Audience (if restricted)

All employees

Revision History

Version	Approval Date	Author	Description
1.0	03/07/2019	Legal & Secretariat	Review for 1 July 2019 changes
2.0	10/06/2020	Corporate Governance & Secretariat	Review of content

About this Standard

Purpose

At Bank of Queensland (**BOQ**) we have a culture of open communication, doing what is right and encouraging and supporting BOQ Team Members to report Reportable Conduct.

To achieve these goals we have adopted BOQ's Code of Conduct and BOQ's Whistleblower Policy in accordance with which we:

- aim to live our purpose & values;
- act with honesty and integrity;
- treat others with respect, value diversity, maintain a safe working environment and communicate professionally;
- identify and manage conflicts of interest;
- respect and maintain privacy, confidentiality and disclosure;
- comply with legal obligations and internal standards; and
- immediately deal with and report suspected breaches of the Code of Conduct, applicable laws and regulations and BOQ's policies and standards.

This Whistleblower Standard supports our Whistleblower Policy, and provides practical guidance to all BOQ Team Members, whether you are a Whistleblower (see section 1), a Recipient (see section 2), coordinating BOQ's Whistleblower Program (see section 3), investigating a Whistleblower Report (see section 4), overseeing the Whistleblower Program (see section 5), providing support to a Whistleblower (see section 6) or simply interested in how BOQ responds to Whistleblower Reports. If you are thinking of making a Whistleblower Report, we encourage you to read this Whistleblower Standard to see not only what you need to do, but also what we will do with the information you give us.

Scope

This Whistleblower Standard applies to all BOQ Team Members, in particular where they are making a report of Reportable Conduct pursuant to the Whistleblower Policy. This Whistleblower Standard should be read in conjunction with the Whistleblower Policy.

Key Principles

There are two key principles that inform everything we do in responding to Whistleblower Reports. These principles create obligations that apply to everyone in our Whistleblower Program, including everyone receiving or investigating a Whistleblower Report. All BOQ Team members should be aware of these principles.

We protect the confidentiality of people who make Whistleblower Reports.

We have designed our Whistleblower Program to make the confidentiality of Whistleblowers a priority.

The Whistleblower's identity must be kept confidential to the fullest extent possible, and only shared as permitted by the Whistleblower or by law.

It is the responsibility of anyone who obtains the identity, or information likely to lead to the identification, of a Whistleblower to follow the processes in the Whistleblower Standard to keep that information confidential. Failing to do so carries serious consequences.

If in doubt you should speak to the Whistleblower Coordinator.

We protect Whistleblowers from detriment.

We believe that Whistleblowers should not suffer detriment for making a Whistleblower Report. At BOQ we do not tolerate penalising people because they make, propose to make or can make a Whistleblower Report.

We have systems in place to support and protect Whistleblowers and to respond to any allegations of retaliation, threatening, victimising or detrimental conduct.

Not causing detriment to Whistleblowers, and indeed making a Whistleblower Report if you see a Whistleblower is suffering detriment because of making a Whistleblower Report, is a responsibility of all BOQ Team Members.

Definitions & Key People

“Action Item”:- means the steps decided to be taken by the Group Executive following receipt of an Investigation Report.

“Action Item Owner”:- means the person that the Group Executive assigns as the person responsible for completing a particular Action Item.

“BOQ Team Member”:- has the meaning given in section 1.1.

“De-identified Register”:- means the de-identified version of the Whistleblower Register maintained by the Whistleblower Coordinator for the purpose of reporting to the Board and the Group Executive.

“Detriment Report”:- means a Whistleblower Report relating to alleged detrimental conduct caused or threatened to a Whistleblower because they made, propose to make, or could make a Whistleblower Report.

“Group Executive”:- means the Group Executive, People & Culture, who is also the Executive Champion of the Whistleblower Program.

“Investigation Lead”:- means the person from the Investigation Leads assigned that role in relation to the particular Whistleblower Report.

“Investigation Leads”:- means those persons appointed to that role by the Group Executive.

“Investigation Plan”:- means a plan developed by the Investigation Lead for conducting an investigation into a Whistleblower Report.

“Investigation Report”:- means a report prepared by the Investigation Lead summarising the findings and recommendations arising from the investigation.

“Personal Work-related Grievances”:- means grievances relating solely to an individual’s current or former employment that have implications for the individual personally, and is not Reportable Conduct or a Detriment Report. Examples include: interpersonal conflicts between two employees or a promotion outcome decision, a decision relating to individual’s engagement, transfer or promotion, a decision relating to the terms and conditions of the individual’s engagement, or a decision or to suspend or terminate the individual’s engagement or to discipline the individual.

“Recipient”:- means variously the Whistleblower Coordinator, the external whistleblowing service provided by PwC or a Statutory Recipient when receiving or dealing with a Whistleblower Report.

“Reportable Conduct”:- has the meaning given under heading 1.3.

“Recipient Quick Guide”:- means the guidance note entitled ‘Recipient Quick Guide’ provided to potential Statutory Recipients.

“Statutory Recipient”:- means any of the persons listed under the ‘When will I be protected?’ section of Appendix 1 to the Whistleblower Policy.

“De-identified Report”:- means as summary of a Whistleblower Report prepared by a Recipient as described under heading 2.1.

“Whistleblower”:- means a person who has made, proposes to make or could make a Whistleblower Report.

“Whistleblower Coordinator”:- means the Deputy Company Secretary except (i) in relation to reports relating to key management personnel (being those persons having authority and responsibility for planning, directing and controlling the activities of the BOQ Group, directly or indirectly, including any

director (whether executive or not) of BOQ or (ii) in the absence of the Deputy Company Secretary, in which case the Company Secretary will be the Whistleblower Coordinator.

“Whistleblower Policy Owner”:- means People & Culture.

“Whistleblower Program”:- means BOQ’s processes for managing and responding to Whistleblower Reports, and includes the Whistleblower Policy and this Whistleblower Standard.

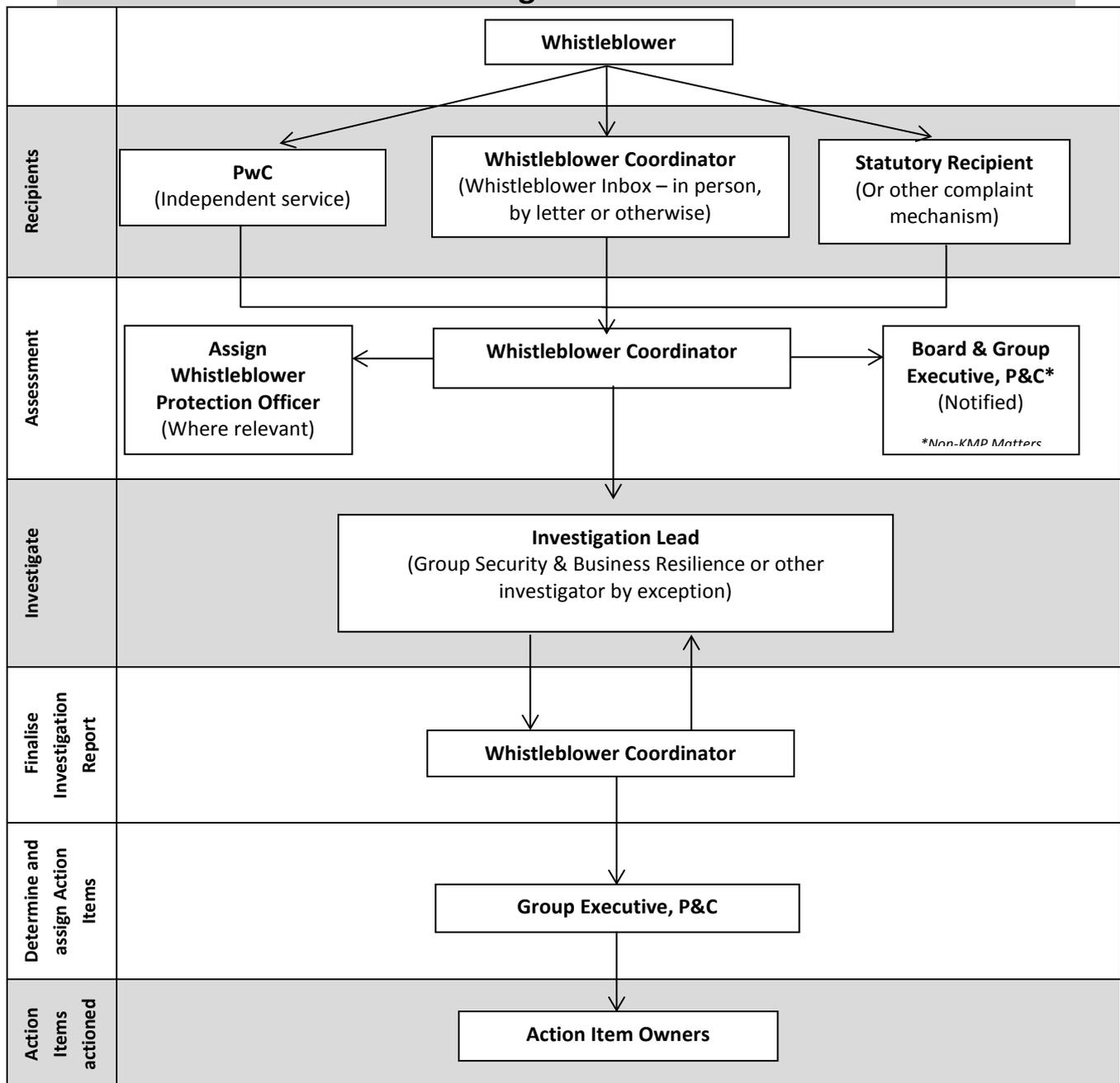
“Whistleblower Protection Officer”:- means those persons appointed to that role by the Group Executive People & Culture including, but not limited to, the Group Executive People & Culture, the Head of Group Assurance and the Company Secretary.

“Whistleblower Protection Officers”:- means those persons appointed to that role by the Group Executive People & Culture.

“Whistleblower Register”:- means the confidential register of Whistleblower Reports maintained by, and accessible only by, the Whistleblower Coordinator.

“Whistleblower Report”: - means a report of Reportable Conduct made pursuant to the Whistleblower Policy.

Overview of Whistleblower Program



Reporting

The Whistleblower Coordinator provides the De-Identified Register to the Board on a monthly basis and to the Group Executive, People & Culture on a regular basis for trend reporting.

Annual review

BOQ's Whistleblower Program will be reviewed annually by the Group Executive, People & Culture together with Corporate Governance & Secretariat to ensure that it remains effective and relevant to BOQ and that it continues to comply with relevant laws.

Ongoing continuous improvement

The Group Executive, People & Culture monitors the progress of Whistleblower Reports, identifies trends in Whistleblower Reports or how they are handled, reports any trends to the Board and oversees learnings for the continuous improvement of the Whistleblower Program.

1 Guidance for Whistleblowers

1.1 Who can be a Whistleblower?

All BOQ Team Members are able to report Reportable Conduct. BOQ Team Members are current and former officers, employees, associates and suppliers (including the supplier's employees) of BOQ. They also include the relatives, dependents and spouses of those people and BOQ's contractors, consultants, members (including owner-managers and their employees) of BOQ's franchise network, third party providers, secondees, brokers, and auditors.

1.2 How can I make a Whistleblower Report?

As a first point of call we encourage you to **speak to someone you're comfortable talking to**. However, if you wish for your report to be dealt with pursuant to the Whistleblower Policy and this Whistleblower Standard you can make your report by way of the 'Ways to make a Whistleblower Report' below. Regardless of how you do it, all Whistleblower Reports are dealt with in the same way. Namely, subject to confidentiality, Whistleblower Reports will be referred to the Whistleblower Coordinator who will consider the Whistleblower Report and decide what steps to take next.

Ways to make a Whistleblower Report

If you wish to make a Whistleblower Report, we encourage you to use one of the following options:

- **The Whistleblower Coordinator.** This can be done either by way of the Whistleblower Inbox, at Whistleblower@boq.com.au or by contacting the Whistleblower Coordinator directly.
- **BOQ's external whistleblowing service**, provided by PwC. PwC may be contacted by one of the following methods:
 - Telephone the disclosure hotline on 1800 033 938, available between 8am and 5pm, Monday to Friday (EST).
 - Email: boq@au.pwc.com.
 - In writing: PwC, BOQ Whistleblowing Service, GPO Box 336, Brisbane, QLD, 4001.

You may also make a Whistleblower Report to a Statutory Recipient (see the Whistleblower Policy for details).

1.3 What can I make a Whistleblower Report about?

We encourage you to report any Reportable Conduct. Reportable Conduct is any suspected or actual misconduct or improper state of affairs or circumstances in relation to BOQ or a member of its franchise network and includes (but is not limited to):

1. any conduct that is illegal, dishonest, unethical or improper;
2. breach of laws or regulations;¹
3. tax-related misconduct;
4. criminal activity;
5. bribery or corruption;
6. conduct endangering health and safety or causing damage to the environment;
7. conflicts of interest;
8. anti-competitive behaviour;
9. financial fraud or mismanagement;

¹ For example, a breach of laws or regulations, including an offence against, or a contravention of, the *Corporations Act 2001*, the *ASIC Act 2001*, the *Banking Act 1959*, the *Financial Sector (Collection of Data) Act 2001*, the *Insurance Act 1973*, the *Life Insurance Act 1973*, the *National Consumer Credit Protection Act 2009*, the *Superannuation Industry (Supervision) Act 1993*, or an instrument made under one of those Acts, tax laws, or an offence against any Commonwealth law punishable by imprisonment for 12 months or more.

10. insider trading;
11. breach of trade sanctions or other trade controls;
12. unauthorised use of BOQ's confidential information;
13. conduct that represents a danger to the public or to the stability of, or confidence in, the financial system;
14. conduct giving rise to the possibility of causing financial or non-financial loss to BOQ, likely to damage the financial position or reputation of BOQ, or that might otherwise be detrimental to the interest of BOQ; and
15. deliberate concealment of any of the above.

Reportable Conduct does not need to relate to a contravention of law. A breach of BOQ's Code of Conduct or other BOQ policies or standards may, at times, be Reportable Conduct and should be reported.

Reportable Conduct generally does not include:

- Personal Work-related Grievances; or
- matters that may be dealt with by BOQ's customer complaints process.

You should have reasonable grounds to believe the information you are disclosing is true, but you will not be penalised even if the information turns out to be incorrect. You must not make a Whistleblower Report that you know is not true or is misleading.

Employees should also consider if another avenue for raising concerns is more appropriate, for example employment matters may be better dealt with through the Harassment, Discrimination & Bullying Standard.

Can I make a Whistleblower Report anonymously?

Yes you can. You're welcome to make an anonymous Whistleblower Report. The easiest way to do this is via the whistleblowing service (PwC).

However, we've created our Whistleblower Program and instilled the key principles of confidentiality and not causing detriment so that your Whistleblower Report will be handled the same way regardless of whether you disclose your identity to us or not.

1.4 What can I do to help?

Be detailed: Without sufficient information, we may not be able to respond to, or investigate, your Whistleblower Report. We encourage you to be detailed and tell us everything you can: who, what, when, where, and how.

Help us to help you: In order to respond to your Whistleblower Report we need to share some information with our Whistleblower Coordinator and those involved in any investigation. To help us with any investigation and better protect your identity, we encourage you to agree to us sharing your identity with those involved in responding to and investigating your Whistleblower Report. If you have concerns about this, you can discuss this with the person you made your Whistleblower Report to or the Whistleblower Coordinator. We ask that you at least provide us a way to contact you.

Be mindful of your confidentiality: You should be mindful of protecting your confidentiality. For example others within BOQ may be able to guess your identity if you have previously mentioned to them you wish to make a report, or if you tell others you have made a Whistleblower Report.

To help protect and support you, we can also assign a Whistleblower Protection Officer to support you and act as your point of contact in relation to your Whistleblower Report. We'd encourage you to agree to this assignment, and agree for us to share your identity with the Whistleblower Protection Officer.

1.5 How does BOQ protect me against detriment?

BOQ takes all allegations of detrimental conduct very seriously. Broadly speaking, BOQ protects Whistleblowers in four main ways:

- **Protection of confidentiality:** The most effective way of protecting you from detrimental conduct is by keeping your identity confidential to the fullest extent possible. For this reason, BOQ has designed its Whistleblower Program to minimise the sharing of your identity.
- **Prohibition on detrimental conduct:** Anyone found to be engaging in detrimental conduct may be subject to disciplinary action, which may include termination of their employment or engagement.
- **Whistleblower Protection Officer:** Where possible, the Whistleblower Coordinator will assign you a Whistleblower Protection Officer who will support you and help protect you from detrimental conduct. They are your point of contact and the person who is available to listen to any concerns you have. They will help arrange additional support for you where needed and can escalate any concerns you have with how your Whistleblower Report is being dealt with.
- **Additional Support:** In addition to the above, BOQ may provide a range of other types of support as BOQ considers appropriate in the particular circumstances.

Unfortunately, BOQ can only deal with matters under its control – it cannot provide the same level of support to people who aren't employees of BOQ. While these protections may not be able to be applied to non-employees, BOQ will still seek to offer as much support as reasonably practicable.

BOQ is committed to protecting those Whistleblowers who are members of BOQ's franchise network, and will take steps to ensure people do not engage in detrimental conduct.

1.6 What is detriment and what can I do about it?

Detrimental conduct is conduct causing detriment to a Whistleblower because they have made, or have threatened to, proposed to, or could make, a Whistleblower Report.

BOQ gives a broad meaning to detriment. Any harm to you as a Whistleblower can be detriment. To assist, we've provided some examples of types of actions that may be considered detriment.

Conduct will only be detrimental if it is undertaken because you are making a Whistleblower Report or have threatened to, proposed to or could make a Whistleblower Report. At times BOQ will need to legitimately manage the performance of BOQ Team Members. Such legitimate conduct is not detrimental conduct.

Causing detriment is Reportable Conduct. Where you have been caused detriment because you have made, propose to make or could make a Whistleblower Report, you should report it by way of one of the options listed in 'Ways to make a Whistleblower Report' above. This is referred to in this Standard as a 'Detriment Report'.

Examples of support

BOQ can offer a range of support adapted to the particular circumstances. Some examples of support that BOQ may provide where appropriate include:

- monitoring and managing the behaviour of other employees;
- relocating employees (which may include the people alleged to have been involved in the Reportable Conduct) to a different division, group or office;
- offering a leave of absence or flexible workplace arrangements while a matter is investigated;
- current employees may access BOQ's Employee Assistance Program; and/or
- rectifying the detriment.

Examples of detriment

Detriment includes (but is not limited to):

- dismissal of an employee;
- injury of an employee in his or her employment;
- alteration of an employee's position or duties to his or her disadvantage;
- discrimination between an employee and other employees of the same employer;
- harassment or intimidation of a person;
- harm or injury to a person, including psychological harm;
- damage to a person's property;
- damage to a person's reputation;
- damage to a person's business or financial position; and
- any other damage to a person.

1.7 When will BOQ assign a Whistleblower Protection Officer?

BOQ can only assign a Whistleblower Protection Officer to you if you've agreed to share your identity. For this reason, we encourage you to share your identity with the person to whom you make your Whistleblower Report, and to consent to your identity being shared with a Whistleblower Protection Officer.

1.8 What happens after I make a Whistleblower Report?

As an initial step, the Recipient of your Whistleblower Report may ask you for further information and the above consent regarding your identity.

After that, if you have not directly contacted the Whistleblower Coordinator, the Recipient of your Whistleblower Report will refer your Whistleblower Report to the Whistleblower Coordinator. Their role is set out in detail later in this document; however, they are essentially the central organising point for Whistleblower Reports. The Whistleblower Coordinator will consider your Whistleblower Report and decide what steps should be taken.

If you have agreed to sharing your identity as described above, the Whistleblower Coordinator may contact you for additional details. They will also be the one to assign a Whistleblower Protection Officer to you (who may themselves contact you). The Whistleblower Coordinator may also assign an Investigation Lead to conduct any investigation into your Whistleblower Report. If this occurs, the Investigation Lead may seek to contact you to discuss your Whistleblower Report and the investigation.

Otherwise, where possible, you will be provided with regular updates about the progress of your Whistleblower Report, including what action has been decided to be taken and feedback at completion of the process. However, the timing of updates and level of detail we can provide will depend on the nature of your report. In some circumstances it may not be appropriate to provide details of the outcome with you.

1.9 What if I'm unhappy about how my Whistleblower Report is being handled?

If you are dissatisfied with how your Whistleblower Report is handled or the outcome of an investigation, you should talk to the Whistleblower Coordinator or your Whistleblower Protection Officer (where one has been assigned to you).

Where this occurs, the Whistleblower Coordinator will review the investigation and consider whether it was conducted in accordance with our procedures. The Whistleblower Coordinator may at their discretion determine to reopen an investigation if they conclude further investigation is required or that new information is available.

Where your concern relates to the Whistleblower Coordinator, you should contact the Group Executive.

2 Guidance for Recipients

As a Recipient, your objective is to create a safe environment in order to receive as much detail from the Whistleblower as they are comfortable providing and then, subject to confidentiality requirements, pass that information onto the Whistleblower Coordinator to take the matter forward. Ultimately, BOQ hopes you will be permitted by the Whistleblower to refer the Whistleblower Report to the Whistleblower Coordinator. The Whistleblower Coordinator will take over conduct of responding to the Whistleblower Report from there.

2.1 Steps to take as a Recipient

When you receive a Whistleblower Report, you should:

1	<p>Location and time</p> <p>If you have been asked to a meeting to receive the Whistleblower Report, you should consider whether the location and time of that meeting are appropriate for the disclosure to make their disclosure comfortably and confidentially.</p>		
2	<p>Consider if the report is a Whistleblower Report</p> <p>At times, reports you receive will not be Whistleblower Reports – i.e. they will not relate to Reportable Conduct. For example: a report that does not raise an allegation but is actually requesting information about a policy or seeking guidance under the Code of Conduct.</p> <p>When you receive a report you should consider whether it relates to Reportable Conduct. Sometimes it may not be clear what a report is actually alleging. If appropriate, you can seek further information from the Whistleblower. In assessing whether it relates to Reportable Conduct, focus on the substance of the report, not the motives of the Whistleblower.</p> <p>Does the report relate to Reportable Conduct?</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>Yes/Unsure</p> <p>Where the report relates to Reportable Conduct or you remain unsure, it will need to be referred to the Whistleblower Coordinator.</p> </td> <td style="width: 50%; vertical-align: top;"> <p>No</p> <p>Where the report does not relate to Reportable Conduct, you should do what you can to resolve it or refer it to another channel within BOQ, such as the Harassment, Discrimination & Bullying Standard. If you cannot resolve it or the Whistleblower wishes for the matter to be escalated, it will need to be referred to the Whistleblower Coordinator.</p> <p>If in doubt, treat the report as if it does relate to Reportable Conduct.</p> </td> </tr> </table>	<p>Yes/Unsure</p> <p>Where the report relates to Reportable Conduct or you remain unsure, it will need to be referred to the Whistleblower Coordinator.</p>	<p>No</p> <p>Where the report does not relate to Reportable Conduct, you should do what you can to resolve it or refer it to another channel within BOQ, such as the Harassment, Discrimination & Bullying Standard. If you cannot resolve it or the Whistleblower wishes for the matter to be escalated, it will need to be referred to the Whistleblower Coordinator.</p> <p>If in doubt, treat the report as if it does relate to Reportable Conduct.</p>
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3	<p>Obtain consent to refer the Whistleblower Report to the Whistleblower Coordinator</p> <p>You can only share the Whistleblower’s identity with the Whistleblower Coordinator and others involved in responding to and investigating the Whistleblower Report with the Whistleblower’s consent.</p> <p>The Recipient Quick Guide sets out how you should seek this consent (the Whistleblower Coordinator or People & Culture can provide you with a copy if you do not have one).</p> <p>If the Whistleblower refuses, you will need to de-identify the report. This may require more than simply removing the Whistleblower’s name from the report. You should contact Legal to discuss your obligations and what information you can share with the Whistleblower Coordinator.</p>		
4	<p>Refer the Whistleblower Report to the Whistleblower Coordinator</p> <p>This can occur in one of two ways:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>Where the Whistleblower gives consent</p> <p>You should simply forward the Whistleblower Report to the Whistleblower Coordinator as is, along with confirmation of their consent.</p> </td> <td style="width: 50%; vertical-align: top;"> <p>Where the Whistleblower does not give consent</p> <p>You will need to prepare a De-identified Report to send to the Whistleblower Coordinator.</p> </td> </tr> </table>	<p>Where the Whistleblower gives consent</p> <p>You should simply forward the Whistleblower Report to the Whistleblower Coordinator as is, along with confirmation of their consent.</p>	<p>Where the Whistleblower does not give consent</p> <p>You will need to prepare a De-identified Report to send to the Whistleblower Coordinator.</p>
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A De-identified Report is an extract of the Whistleblower Report with identifying information removed. To the extent possible, it should use the same words as (or directly quote) the Whistleblower Report. However, it must not contain the Whistleblower's identity and you must take all reasonable steps to reduce the likelihood that the Whistleblower will be identified from the information you provide. If in doubt, you should contact Legal for advice on what information you can include in the De-identified Report.

5 Inform the Whistleblower of referral to the Whistleblower Coordinator

Once you have referred the Whistleblower Report or De-identified Report to the Whistleblower Coordinator you should (if you are able) inform the Whistleblower that their Whistleblower Report / a summary of their Whistleblower Report has been given to the Whistleblower Coordinator.

From this point, your role in relation to the Whistleblower Report is complete. However, where the Whistleblower has not consented to their identity being shared with the Whistleblower Coordinator (or by exception it is decided or requested that you remain the point of contact for the Whistleblower) you may be asked to have a limited continuing role as the point of contact with the Whistleblower.

Ask Legal for advice

If you are in doubt in relation to any of your obligations or what you should do, do not hesitate to contact Legal or the Whistleblower Coordinator for guidance.

Whistleblowing takes courage

Whistleblowing is not easy. At times, deciding to make a Whistleblower Report will have been a very difficult decision. When receiving a Whistleblower Report, you should be sensitive to this fact, be polite and treat the person with respect.

Tips for preparing a De-identified Report

Consider the following when drafting a De-identified Report.

- Have you removed all references to the Whistleblower's identity?
- Have you removed identifying references (such as 'My role is to...')?
- Have you removed any identifying signatures or email addresses (e.g. in an email chain)?
- Have you considered the context in which the Whistleblower Report is given – i.e. could only one person have made the Whistleblower Report?

2.2 Your role in relation to reporting detriment

You, and any other BOQ Team Member, must not cause detriment to a Whistleblower because they have made, propose to make, or could make a Whistleblower Report. Doing so is Reportable Conduct.

Where you become aware that a Whistleblower is suffering detriment because of their Whistleblower Report you should report it to the Whistleblower Coordinator (or the Group Executive if you believe the Whistleblower Coordinator is contributing to the detriment). Your report (referred to in this Whistleblower Standard as a "Detriment Report") will be treated as a separate Whistleblower Report and you will be given the same protections as the Whistleblower.

3 Guidance for the Whistleblower Coordinator

As the Whistleblower Coordinator, you are the central organising point for the Whistleblower Program and the custodian of confidential information. You must maintain the Whistleblower Register and the De-identified Register (see below) and minimise the risk of breaching confidentiality obligations.

Where the report is a Detriment Report you will need to treat this as any other Whistleblower Report. However, you will also need to take immediate steps to ensure that that conduct is not ongoing. This might include assigning a Whistleblower Protection Officer as soon as possible who will be responsible for mitigating any harm to the Whistleblower.

3.1 Your role in receiving and responding to Whistleblower Reports

You may receive a Whistleblower Report directly or indirectly through another person. Regardless, your role is the same, namely to do the following promptly, fairly and objectively:

1	<p>Follow the Guidance for Recipients</p> <p>Where you receive a Whistleblower Report directly, you should undertake the first and second steps In the Guidance for Recipients. Where you have received the Whistleblower Report indirectly, you should verify that these steps have been completed, and require that they be completed (where possible). You will need to form your own view as to whether the report is a Whistleblower Report (i.e. whether it relates to Reportable Conduct).</p>
2	<p>If the Whistleblower Report does not relate to Reportable Conduct</p> <p>Where the report does not relate to Reportable Conduct, you should (as appropriate):</p> <ul style="list-style-type: none"> • direct the report to the appropriate channel; or • contact the Whistleblower to either attempt to resolve the report, or advise how it is being dealt with.
3	<p>Assign a matter number to the Whistleblower Report</p> <p>Where the report does relate to Reportable Conduct, you will need to assign a matter number to the Whistleblower Report. Where the report is a Detriment Report, you should assign it its own matter number but make a note of the Whistleblower Report to which it relates.</p>
4	<p>Whistleblower Register and maintaining confidentiality</p> <p>You are responsible for managing confidential information. This is done by way of maintaining the Whistleblower Register (which only you should have access to). The People & Culture team have a blank template of the Register that can be provided on request. You should record all relevant details of the Whistleblower Report, the Whistleblower and, ultimately, the progress of the matter (e.g. progress of any investigation etc.) in the Whistleblower Register.</p> <p>If the Whistleblower has not agreed to their identity being shared, you will need to take all reasonable steps to reduce the likelihood that the Whistleblower will be identified from the information you share. If you have questions about what can be shared, you may seek guidance from Legal.</p>
5	<p>Determine if you have any reporting obligations</p> <p>You should determine whether the Whistleblower Report gives rise to any other reporting obligations, such as continuous disclosure obligations or anti-money laundering obligations (see BOQ's AML / CTF Program – Part A / B) or the Banking Executive Accountability Regime.</p>
6	<p>Notify the Board</p> <p>Within 48 hours of receiving the Whistleblower Report, you must complete and issue a standard form notice to the Board, or its nominee directors, and the Group Executive. The Group Executive will not be notified if the Whistleblower Report relates to a member of Key Management Personnel or a member of the Board. For the avoidance of doubt, this provision relates only to initial notification of by the Whistleblower Coordinator and does not preclude involvement of the Group Executive where the Whistleblower's consent has been provided in respect of complaints relating to a member of Key Management Personnel.</p> <p>The notice is limited to the fact that a Whistleblower Report has been made, the nature of the Reportable Conduct (e.g. bribery, false accounting etc), the date the Whistleblower Report was received, the business unit and person to which the allegations relate and a comment that it is now being progressed pursuant to the Whistleblower Program. When preparing the notice you need to keep in mind your overriding</p>

	confidentiality obligations and ensure that any information you provide is not likely to identify the Whistleblower (if they have not given consent).
7	<p>Assign a Whistleblower Protection Officer</p> <p>If the Whistleblower has given consent and it is appropriate, you should assign a Whistleblower Protection Officer from the list of Whistleblower Protection Officers maintained by the Group Executive. It is recommended that a Whistleblower Protection Officer be assigned regardless of the severity of the allegations in the Whistleblower Report.</p>
8	<p>Assess whether an investigation is appropriate and assign an Investigation Lead and scope investigation</p> <p>As an initial step you will need to assess whether an investigation is appropriate.</p> <p>Where you determine an investigation is appropriate, you will need to:</p> <ul style="list-style-type: none"> • consider whether legal advice is required in relation to the investigation; • determine the purpose and scope of the investigation (this may require consultation with Legal); and • assign an Investigation Lead from the list of Investigation Leads. The Investigation Lead will generally be from Group Security & Business Resilience (but may be from another team by exception). <p>Depending on the nature of the allegation, it may or may not be necessary for the identity of the Whistleblower to be shared with the Investigation Lead. The Whistleblower Coordinator should assess whether that information is necessary to enable an effective investigation.</p> <p style="text-align: center;">Is legal advice required?</p> <ul style="list-style-type: none"> • For more serious matters or where there is a risk of legal exposure for the company, legal advice may be required. • If so, a lawyer should be involved to confirm the next steps, whether any investigation steps are needed to enable advice to be provided, and what steps need to be followed to maintain privilege. • It is important to address this question first so as to maintain privilege over any investigation steps the instructing lawyer may require.

3.2 Your role in an investigation

You have a role in relation to investigations, however you are not directly involved in conducting the investigation itself. Your role is to:

1. assign an Investigation Lead;
2. monitor open investigations and follow up on expected completion of Investigation Reports on a monthly basis (in preparation for your reporting to the Board);
3. review and finalise draft Investigation Reports provided by the Investigation Lead; and
4. update the Whistleblower Register in relation to the progress and results of the investigation.

The purpose of your review of the draft Investigation Report is to promote consistency in the approach to investigations, and in outcomes, format, learnings and recommendations across all investigations. You should also ensure that the Investigation Report does not identify the Whistleblower.

The Investigation Report may be returned to the Investigation Lead for further consideration or investigation. Alternatively, the Investigation Report may be finalised. Completion of the investigation should be recorded in the Whistleblower Register. Once finalised, the Investigation Report must be sent to the Group Executive.

3.3 Your role in relation to Action Items

You do not set, and are not involved in the completion of, Action Items. This is led by the Group Executive.

However, the Group Executive will provide you with monthly updates on what Action Items have been

identified and the progress of completing those Action Items. This is to assist with your monthly updates to the Board.

3.4 Your role in reporting to the Board

You are to provide updates to the Board at each Board meeting on the status of Whistleblower Reports and investigations.

This is to be done by way of the De-identified Register (People & Culture have a copy of the template for the De-identified Register). The De-identified Register should not contain:

- the identity of the Whistleblower; or
- any information likely to lead to the identification of the Whistleblower.

You will also need to regularly provide data and the De-identified Register to the Group Executive so that they can identify and report to the Board on trends in the Whistleblower Program.

3.5 Updating the Whistleblower

Unless a Whistleblower Protection Officer has been assigned to the Whistleblower, or you are not aware of the identity of the Whistleblower, you will be required to update the Whistleblower. If actions have been identified, the Whistleblower should be advised of those actions in general terms. They should not be given specifics of any disciplinary action, if any, taken.

3.6 Feedback on Investigations

You are also responsible for tracking learnings from investigations, both:

- in relation to the subject matter of the investigation – for which you will ensure the relevant learnings are shared with relevant groups; and
- in relation to the Whistleblower Program – for which you will ensure learnings are communicated to the Group Executive and People & Culture.

Shared learnings should not contain information about the identity of Whistleblowers.

You must also report to the Ethics Committee at each meeting on the number of Whistleblower Reports received.

4 Guidance for the Investigation Lead

As an Investigation Lead, your role is to conduct investigations in a timely manner, fairly and independently from any persons to whom the Whistleblower Report relates. All employees and contractors must cooperate fully with any investigations.

4.1 How will I be appointed and assigned?

The Whistleblower Coordinator will assign an Investigation Lead from the list of Investigation Leads appointed by the Group Executive.

4.2 Establishing an Investigation Plan

Once you have been assigned to investigate a Whistleblower Report by the Whistleblower Coordinator, you will need to establish an Investigation Plan. The Investigation Plan must follow the scope of Investigation directed by the Whistleblower. The Investigation Plan should address (at a minimum):

Resourcing	<p>What resources are needed?</p> <p>You will need to assemble an appropriately sized team with the requisite skills and availability to conduct the investigation. It may also be necessary to liaise with the IT team to establish access to files and email systems as needed. However, it is also important to keep the team to a minimum for the purpose of information control.</p> <p>The Recipient and the Whistleblower Protection Officer should not be involved in conducting the investigation (neither should the Whistleblower Coordinator beyond assigning the Investigation Lead and determining the scope of the investigation).</p>
How	<p>How will the investigation be conducted?</p> <p>The investigation can take several forms and should be done in the manner most appropriate to the allegation. It may include a review of files, review of email accounts, interviews with members of the team, and / or review of accounting records. For review of files and emails, it will be necessary to establish search parameters e.g. whose emails, for what date range and responsive to what search terms (or other search methods).</p> <p>The investigation should typically include an interview with the person(s) against whom the Whistleblower Report is directed.</p>
Urgent immediate steps	<p>Are any immediate steps required to be taken urgently at the outset?</p> <p>The plan should consider if any urgent steps are required at the outset, e.g. to preserve evidence or to ensure safety.</p>
Consultation	<p>Consult with relevant people</p> <p>The Investigation Plan may also need to incorporate consultation with relevant stakeholders or people with relevant experience – particularly when preparing recommendations (if any).</p>

4.3 Protecting the confidentiality of the Whistleblower

You will need to consider the confidentiality of the Whistleblower as you plan and conduct the investigation.

In gathering evidence and interviews, consider whether any requests or questions might disclose information which could identify the Whistleblower. This risk particularly arises in smaller teams or where information is only known to a smaller group of people. You need to take reasonable precautions not to disclose information which might identify the Whistleblower.

You may seek advice from Legal about how to approach evidence gathering or an interview.

4.4 Ensuring fair treatment of people mentioned in disclosures

It is important that you treat any person identified in a Whistleblower Report fairly and objectively. Any conclusions must be based on the balance of probabilities and on the basis of reliable evidence.

4.5 Conducting an investigation

Every investigation is different and there is no one single way to conduct an investigation. This Standard does not attempt to prescribe a process but instead provides some tips and considerations for an effective investigation.

Critical features of a robust investigation

- Investigation is thorough and timely.
- Investigation ensures fair and respectful treatment of people investigated.
- Investigation reaches conclusions (if any) on balance of probabilities and on reliable evidence.
- Investigation is conducted confidentially, and in a mindful way (avoiding inadvertently identifying the Whistleblower).
- Decisions made and steps taken are documented.

Considerations for document/email review

- Early engagement with IT to prevent loss of data.
- When appropriate, conduct custodian interviews to determine filing and record keeping practices.
- Consider wide range of systems on which people may have records (i.e. email, desktop, text, Skype etc.).
- Scope of investigation is adapted to seriousness of allegation and resources of team.
- Carefully consider search parameters.

Considerations for interviews generally

- Preparation is key.
- Interviews should be held in private settings free from distractions.
- Advance notice of the interview should be given.
- Interviewees should have the option of having a support person present.
- Interviewees are told interview is confidential.
- Interviews are documented.
- Where conducted by a lawyer, it may be necessary to remind interviewee that the lawyer represents BOQ or provide other cautions at the start of an interview.
- Provide interviewees with documents and obtain their comments on them – do not provide an interviewee with a document they have not previously seen.
- Use open questions – i.e. questions that encourage a narrative response, rather than closed questions that invite 'yes' or 'no' responses.
- End the interview with an open question that asks the interviewee to share any further useful information.
- Remind interviewees not to discuss their recollections with other staff.

Considerations for interviewing person against whom Whistleblower Report is directed

- Care is needed to ensure confidentiality of the Whistleblower.
- Gather as much information relating to the Reportable Conduct as possible prior to the interview, including conducting interviews with other people involved first.
- At the beginning of the interview advise the person of the nature of the investigation and alleged conduct in general terms and ask for their comments.
- Allow the person to respond to each allegation.
- Do not force or suggest responses.
- At the end of the interview, advise the person how much longer the investigation is expected to take and that they may provide further responses before that time. Also advise of the consequences if a breach is found to have occurred.

Be mindful and careful to avoid causing detriment to the Whistleblower

For example, arranging private meetings with the Whistleblower in the office may cause suspicion.

4.6 Timing of investigations

All investigations should be conducted in a timely manner. The length of investigations will be monitored and reported to the Board.

4.7 Reporting to the Whistleblower Coordinator

The Whistleblower Coordinator is required to provide monthly updates on Whistleblower Reports and the investigation of Whistleblower Reports. As a result, you are required to provide the Whistleblower

Coordinator with at least monthly updates in relation to the status and progress of the investigation.

4.8 Preparing a draft Investigation Report

You will need to prepare a draft Investigation Report to be provided to the Whistleblower Coordinator. If details of the Whistleblower have been provided to you, you should ensure these details are not included in the Investigation Report. The Investigation Report should make findings as to whether each allegation has been substantiated, not substantiated, partially substantiated or is unable to be substantiated.

The Investigation Report should also consider organisational learnings and any recommendations. In doing so, it may be necessary to consult with people who have relevant experience in the particular area. For example, recommendations for changes to controls should generally be considered with someone with expertise in the area to ensure that they can be practically implemented.

The Whistleblower Coordinator will review the draft Investigation Report to promote consistency in the approach to investigations, learnings and recommendations across all investigations. The Whistleblower Coordinator may return the draft Investigation Report to you for further consideration or investigation as needed. Alternatively, the Investigation Report may be finalised.

If an investigation is being undertaken at the direction of a lawyer, follow their instructions on preparing and sharing a draft Investigation Report.

5 Guidance for Group Executive

As the Group Executive you are the functional owner of this Whistleblower Standard. You are also the Executive Champion of the Whistleblower Program.

Although the receipt and investigation of Whistleblower Reports is coordinated by the Whistleblower Coordinator you are ultimately responsible for the Whistleblower Program.

The effectiveness and continuous improvement of the Whistleblower Program is your responsibility.

5.1 What information will I receive?

You will:

- be notified of any new Whistleblower Reports received by the Whistleblower Coordinator within 48 hours of them receiving the Whistleblower Report (this notice also goes to the Board);
- receive updates prior to each Board meeting on the status of Whistleblower Reports and investigations into those reports;
- receive copies of Investigation Reports – see section 5.4 below;
- receive the De-identified Register from the Whistleblower Coordinator on a regular basis; and
- decide on Action Items following investigations and assign an Action Item Owner.

This is to enable you to monitor the progress of Whistleblower Reports, identify trends in Whistleblower Reports or how they are handled, and oversee leanings for the continuous improvement of the Whistleblower Program.

5.2 Appointment of Investigation Leads and Whistleblower Protection Officers

You need to appoint and maintain a list of available:

- Investigation Leads; and
- Whistleblower Protection Officers,

who the Whistleblower Coordinator can select from when assigning an Investigation Lead to an investigation of a Whistleblower Report or when assigning a Whistleblower Protection Officer to a Whistleblower.

Investigations will generally be conducted by Investigation Leads from Group Security and Business resilience, but by exception may need to be conducted by other persons, including People & Culture. The list of Investigation Leads you appoint will need to include:

- Investigation Leads from Group Security and Business Resilience, as the primary source of investigators;
- Investigation Leads who are able to conduct investigations in relation to Group Security and Business Resilience as required;
- Investigation Leads who are able to conduct investigations in relation to key management personnel; and
- Investigation Leads from external services.

Where the Whistleblower has given their consent for their identity to be shared with a Whistleblower Protection Officer, one will be assigned to them if considered necessary by BOQ and the Whistleblower. You need to appoint as many people as may be necessary to perform the role of Whistleblower Protection Officer (who may then be assigned by the Whistleblower Coordinator to a Whistleblower on a case by case basis).

5.3 Whistleblower Program Resources

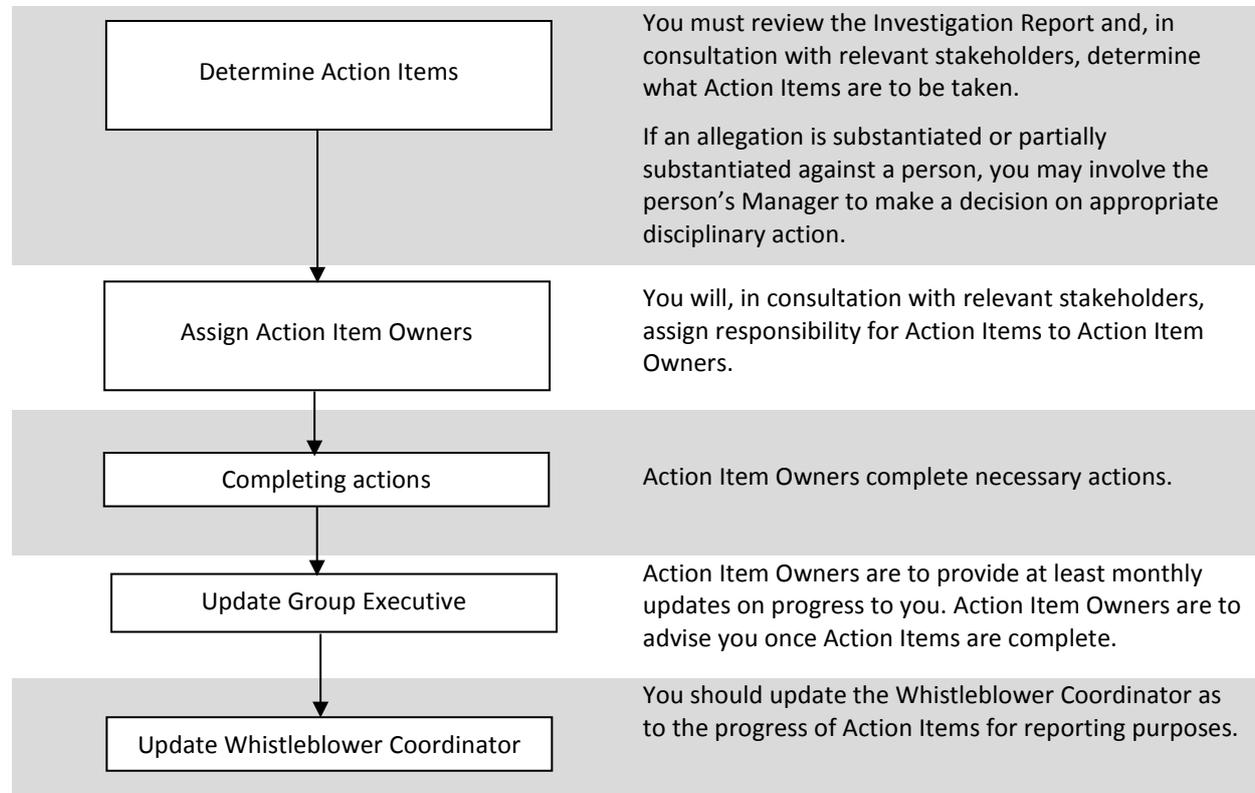
The Whistleblower Coordinators are required to maintain a suite of resources, including the Whistleblower Register, as well as tools like the Recipient Quick Guide.

5.4 Action Items and Action Item Owners

The Whistleblower Coordinator will provide you with a copy of the Investigation Report once it has been finalised.

Your role is to consider findings, learnings and recommendations and to determine Action Items, assign Action Item Owners and then follow up on the performance of Action Items.

These steps (which may be delegated by you as and when required) are set out in the following chart:



5.5 Trend reporting and learnings and continuous improvement of Whistleblower Program

Prior to each Board meeting, you will receive a copy of the De-identified Register from the Whistleblower Coordinator. You will review the De-identified Register with the goal of identifying trends in Whistleblower Reports and the Whistleblower Program.

On a regular basis, you will report to the Board in relation to any trends you identify.

Where you identify issues with the Whistleblower Program, particularly trends or systemic issues in the responding to Whistleblower Reports generally, you should consider steps to address and rectify those issues.

You are also responsible for ensuring People & Culture provide training as part of the Whistleblower Program, as required under the Policy.

The Corporate Governance & Secretariat Team is required to perform an annual review of the Whistleblower Program to ensure that it remains effective and relevant to BOQ and that it continues to comply with relevant laws. You must consider this review and the trends and learnings identified when proposing changes to the Whistleblower Program.

5.6 Reports about the Whistleblower Coordinator

Where a Whistleblower wishes to make a report about the Whistleblower Coordinator, this Whistleblower Standard directs them to make the report to you. If the Whistleblower raises Reportable Conduct, this report may be treated as a Whistleblower Report itself, except that you stand in the place of the Whistleblower Coordinator.

You will therefore need to follow the steps set out in heading 2 'Guidance for Recipients' and heading 3 'Guidance for the Whistleblower Coordinator' and adapt other processes as necessary.

6 Guidance for Whistleblower Protection Officers

As a Whistleblower Protection Officer, your role is to provide support and assistance to the Whistleblower as needed. You will also act as the point of contact for the Whistleblower, and provide them with any updates in relation to the progress of their Whistleblower Report.

6.1 How will I be appointed and assigned?

The Group Executive will appoint Whistleblower Protection Officers (and so will inform you of your appointment).

The Whistleblower Coordinator will assign you to a Whistleblower. However, the Whistleblower Coordinator will only do so if the Whistleblower has agreed for their identity to be shared with you. Generally, the Whistleblower Coordinator will assign you to the Whistleblower as soon as possible. You do not have to accept the assignment if you are uncomfortable doing so.

6.2 What support do I provide?

Your primary function is to provide support and assistance to the Whistleblower. In this role you are not acting for BOQ but for the Whistleblower.

At times this may simply require you to be the person at BOQ who the Whistleblower can talk to about their Whistleblower Report. Depending on circumstances, you may consider it appropriate to take further steps, such as arranging additional support for the Whistleblower (some examples are to the right). As a first step, you should discuss with the Whistleblower the steps taken to ensure their confidentiality. You should also assess the risk of detriment to the Whistleblower (and keep a record of the assessments, and steps taken in response to address the risk of detriment). You should talk to the Whistleblower about what, if any, additional support would assist them in relation to their Whistleblower Report.

Where you identify that the Whistleblower has suffered or been threatened with detriment because they made a Whistleblower Report, you must make a Detriment Report to the Whistleblower Coordinator. This will be treated as any other Whistleblower Report. For a discussion on what is detriment see heading 1.6 of this Whistleblower Standard.

Where the Whistleblower provides you with additional information about their Whistleblower Report that may assist the investigation, you should encourage them to contact the Whistleblower Coordinator or confirm with the Whistleblower that they are happy for you to share that information with the Whistleblower Coordinator. Where they agree, you should do so.

6.3 What other roles do I have?

You will not be involved in conducting the investigation of the Whistleblower Report. However, as the investigation progresses you will, from time to time, be asked to provide updates to the Whistleblower about the progress of the investigation. If the Whistleblower asks you for an update, you should liaise with the Whistleblower Coordinator.

You may also receive reports from the Whistleblower in relation to issues about:

- any detriment they have suffered or been threatened with because they made a Whistleblower Report (i.e. a Detriment Report); or
- the Whistleblower Coordinator.

Where you receive such a Detriment Report you should follow the guidance set out under Heading 2 'Guidance for Recipients'. However, where the report relates to actions taken by the Whistleblower Coordinator, you should refer to the report to the Group Executive, People & Culture.

Examples of support

BOQ can offer a range of support adapted to the particular circumstances. Some examples of support that BOQ may provide where appropriate include:

- monitoring and managing the behaviour of other employees;
- relocating employees (which may include the people alleged to have been involved in the Reportable Conduct) to a different division, group or office;
- offering a leave of absence or flexible workplace arrangements while a matter is investigated;
- current employees and members of the franchise network may access BOQ's Employee Assistance Program; and/or
- rectifying the detriment.