

Policy

Whistleblower Policy

Document Owner: Head of Reward, Performance & Governance

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Accountable Person: Chief People Officer

Bendigo and Adelaide Bank acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation and the Traditional Custodians of the land where we live, learn and work. We pay our respects to Elders past and present as it is their knowledge and experience that holds the key to the success of future generations.



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Overview

Purpose

The Whistleblower Policy (policy) outlines Bendigo and Adelaide Bank Limited's (the Bank/ BEN) and its subsidiaries management and governance arrangements of the Bank's Whistleblower framework and procedures. BEN is committed to promoting a culture of integrity, accountability and ethical behaviour, where our decisions, actions and conduct reflect and reinforce our corporate values. Our Code of Conduct and other policies have been developed to promote a culture where individuals feel safe to report issues or improper conduct.

Whistleblowing is essential to good risk management and corporate governance. It helps uncover misconduct that may otherwise not be detected. The purpose of this policy is to:

- outline the protections available to individuals who disclose wrongdoing, so they feel confident that they can do so without fear of personal Detriment;
- improve BEN's whistleblowing culture and increase transparency in how the Bank handles disclosures of wrongdoing;
- encourage more disclosures of wrongdoing; and
- deter wrongdoing, promote better compliance with the law and promote a more ethical culture, by increasing awareness that there is a higher likelihood that wrongdoing will be reported.

Objective

While staff are encouraged to speak up about a range of matters, the scope of this Policy is limited to disclosures protected under the Whistleblower Protections contained the Corporations Act 2001 (the Act). This includes concerns raised by an *Eligible Whistleblower* about improper conduct, which includes unethical behaviour or breaches of law and/ or policy.

This policy explains how to raise a whistleblower concern and what you can expect if you do. It also aims to provide clarity on:

- the importance of raising your whistleblower concerns;
- explain how you qualify for protection as a whistleblower under the Corporations Act;
- how the Group will deal with whistleblower concerns;
- your rights and protections so you feel safe to speak up; and
- roles and responsibilities.

Application

This policy applies to all officers, employees, suppliers (and their employees), associates, trustee, custodian (and their relatives and/ or dependents) of Bendigo and Adelaide Bank Limited ABN 11 068 049 178 and all related entities within the Bendigo and Adelaide Bank Group ("the Group").

Exclusions

Community Banks are excluded as they have a dedicated Community Bank Whistleblower Policy.

Definitions

Term	Definition
APRA	The Australian Prudential Regulation Authority
ASIC	The Australian Securities & Investments Commission.
Bendigo and Adelaide Bank / BEN	Bendigo and Adelaide Bank Limited (ACN 068 049 178).
Detriment	Any actual or threatened harm or damage suffered by an Eligible Whistleblower as a result of reporting their concern, including (but not limited to): • termination of employment; • harassment, bullying or intimidation; • personal or financial disadvantage; • unlawful discrimination; • harm or injury, including psychological harm; • damage to reputation; or • any other conduct that constitutes retaliation.
Eligible Recipient	An individual who can receive a Protected Disclosure. At BEN this includes all Board members, all Executives, members of the Audit team (internal and external); the Company Secretary, Whistleblower Program Officer, Head of Security & Investigations and Manager Internal Investigations
Eligible Whistleblower	An individual to whom the Whistleblower Protections apply. An individual is an Eligible Whistleblower in relation to BEN if the individual is or has been any of the following: a) an officer; b) an employee; c) an individual who supplies good or services; d) an employee of a person who supplies goods or services; e) an individual who is an associate; and for Bendigo Superannuation Pty Limited the following in addition to the above: f) an individual who is a trustee, custodian or investment manager; g) officer of a body corporate that is a trustee, custodian or investment manager; as well as h) a relative and/ or dependant of an individual referred to in (a) – (g); and i) an individual prescribed by the regulations for the purposes of this paragraph in relation to BEN. Note: See RG 270.43–RG 270.44 and s1317AAA of the Corporations Act. Also see s14ZZU of the Taxation Administration Act.

Emergency Disclosure	The disclosure of information to a journalist or parliamentarian, where the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment. Note: The disclosure must meet a number of other criteria to qualify. See RG 270.76 and s1317AAD(2) of the Corporations Act.
Executive	Executive for this purpose is a person who makes, or participates in making, decisions that affect the whole or a substantial part of the business of the Group or has the capacity to impact significantly the company's financial standing. Within the Group this is defined as a Bendigo and Adelaide Bank Executive Committee member. Our Executives can be found on our corporate internet site under the About Us section.
Group	Bendigo and Adelaide Bank Limited and its related bodies corporate.
Protected Disclosure	A legally protected report (of Reportable Conduct) by an individual regarding misconduct or improper affairs within an organisation covering a wider range of misconduct made to an Eligible Recipient or through the Whistleblower Service .
Public Interest Disclosure	The disclosure of information to a journalist or a parliamentarian, where the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest. The disclosure must meet a number of other criteria to qualify. Note: See RG 270.75 and s1317AAD(1) of the Corporations Act.
Reportable Conduct	Reportable Conduct includes an activity, conduct or state of affairs that is illegal, unethical or improper. For example: • allegation of criminal activity (including fraud, theft, modern slavery, bribery and corruption); • unethical behaviour; • failure to comply with a legal obligation, including taxation obligations; • significant breaches of the Group's Code of Conduct policy or other policy; • breaking any law administered by ASIC, APRA or the Commonwealth; and activities that represent a danger to the public or the financial system. Excludes: Personal work-related grievances. Personal work-related grievances are matters in relation to your current or former employment or engagement that has implications for you personally (that is, matters that are solely related to you). Examples include: • a conflict between you and another employee • a decision relating to your employment or engagement, transfer, remuneration or promotion; or • a decision relating to the termination or terms and conditions of your employment or engagement. Such personal grievances should be raised with the Employee Relations team. However, if that grievance relates to Detriment suffered by you because you have previously raised a concern about Reportable Conduct, then that grievance will be covered by this Policy.

Whistleblower Investigator	The person responsible for investigating disclosures.
Whistleblower Protections	The protections available under the Act to a person who makes a Protected Disclosure.

Supporting Documents

Related documents which should be read in conjunction with this policy include:

- Code of Conduct
- Complaints Procedure for Employees
- Disciplinary Policy
- Fraud Management Policy

Review

This policy will be reviewed by People & Culture every two years to ensure it remains consistent with all relevant legislative requirements and changes within the organisation.

Document Control Table

Version No:	Document owner	Endorsed By	Approved By	Date Approved	Date Applicable	Next Review Date
1.0	People & Performance				01/02/2011	01/02/2013
1.1	People & Performance		People & Performance		01/02/2013	01/02/2015
1.2	People & Performance		People & Performance		28/05/2014	01/02/2015
1.3	People & Performance		People & Performance		06/03/2017	06/03/2019
1.4	People & Performance		People & Performance		08/01/2019	06/03/2019
2.0	People & Culture		Board Governance & HR Committee	11/11/2019	27/11/2019	27/11/2021
2.1	People & Culture		Board	25/05/2021	01/06/2021	May 2023
2.2	People & Culture		People & Culture	22/06/2022	01/07/2022	May 2023
3.0	People & Culture	Board People Culture & Transformation Committee	Board	March 2024	March 2024	March 2026

Policy

1 Whistleblower concerns

Policy Principle

All of us share a responsibility to speak up and report improper conduct. By reporting your whistleblower concern regarding suspected misconduct (*Reportable Conduct*), you make the Group a fair, safe and honest place to work and assist in preventing misconduct and wrongdoing, including theft, fraud and dishonesty. The Group would like to identify and address any wrongdoing as early as possible, so raise your whistleblower concern as soon as you can.

1.1. Who can raise a whistleblower concern?

Individuals both within and external to the Group can raise a whistleblower concern under this policy and qualify for protection (*Protected Disclosure*) under the Corporations Act. Eligible Whistleblowers include current and former:

- employees and Directors;
- Community Bank employees and Directors;
- Alliance Bank employees;
- agency staff;
- contractors, consultants and suppliers;
- third party providers;
- brokers; and
- auditors.

In addition, *Reportable Conduct* may be raised by an associate, relative, dependent or spouse of these individuals.

Community Bank employees and Directors should raise a whistleblower concern under their individual company policies, unless it is not appropriate to do so, in which case the concern may be raised under this policy.

If Community Bank employees and Directors raise a whistleblower concern under this policy, it may still be more appropriate for it to be dealt with under the individual Community Bank company policy. The Whistleblower Program Officer and/or the Whistleblower Investigator have the discretion to determine that a concern raised under this policy should be referred back to and dealt with by the individual Community Bank, under their corresponding policy.

1.2 What is Reportable Conduct?

A 'whistleblower concern' or '*Reportable Conduct*' refers to a concern regarding past, present or future suspected or actual breach of law, our Code of Conduct or another Group policy and is protected (*Protected Disclosure*).

Reportable Conduct includes an activity, conduct or state of affairs that is illegal, unethical or improper. For example:

- allegation of criminal activity (including fraud, theft, modern slavery, bribery and corruption);
- unethical behaviour;
- failure to comply with a legal obligation, including taxation obligations;
- significant breaches of the Group's Code of Conduct, policy or other policy;
- breaking any law administered by ASIC, APRA or the Commonwealth;
- activities that represent a danger to the public or the financial system; and
- dealings with Government officials may be subject to scrutiny from various anti-corruption bodies.

Please note that matters not relating the above *Reportable Conduct* will not be covered by Whistleblower Protections under the Corporations Act.

Further, employee workplace complaints – also known as personal work-related grievances – will be **excluded** from this policy if they do not also relate to *Reportable Conduct*. In those circumstances, the employee workplace complaint will be handled under the Complaints Procedure for Employees.

1.2.1 Employee workplace complaints

An employee workplace complaint, or personal work-related grievance, is a concern or complaint made by an employee relating to their current or former employment or the work environment and have or tend to have, implications for the Whistleblower personally, but do not:

- (a) have any other significant implications for BEN (or another entity); or
- (b) relate to any Reportable Conduct.

An employee workplace complaint may arise from a policy of the Group, or may relate to an act, omission, situation or decision that an employee believes is unfair, discriminatory, unjust or unreasonable.

Examples of employee workplace complaints include:

- performance management;
- disputes between colleagues;
- situations or decisions an employee believes are unfair, unjust or unreasonable;
- routine operational decisions;
- customer service issues;
- policy disagreements; and
- speculative allegations.

We take employee workplace complaints seriously. For them to be best resolved we recommend you raise your complaint via the channels indicated in the 'Raising a Concern' section of the Complaints Procedure for Employees.

If you need assistance in determining if your concern is Reportable Conduct and a whistleblowing matter, or if it is an employee workplace complaint, or for further information on how to raise whistleblower concern, contact the Whistleblower Program Officer.

1.3 Reasonable grounds to suspect

You will not be disadvantaged for reporting a whistleblower concern under this policy, even if it turns out you are mistaken.

We will focus on the quality of the information concerning the Reportable Conduct, not on the motivation of the whistleblower. You are not required to prove the allegations or have all the details but must have reasonable grounds to suspect improper conduct. However, a mere allegation with no supporting evidence is not likely to be considered as having 'reasonable grounds to suspect'. You can still qualify for protection even if the concern turns out to be incorrect.

You must not deliberately make a false report (i.e. a report you know is untrue) under this policy. All matters reported under this policy are treated seriously and a false report will be investigated, and appropriate disciplinary action will be considered.

2 Reporting a Whistleblower Concern

Policy Principle

There are three key avenues through which you can raise a whistleblowing concern and receive protection – internally within the Group or externally:

- through our external Whistleblower Service; or
- contact one of our Eligible Recipients; and
- report directly to our Whistleblower Program Officer.

If you decide to report a whistleblower concern you can do so by disclosing your name, or you can report the matter anonymously.

2.1 External BEN Whistleblower Service

You can report your whistleblower concern regarding suspected misconduct through our external BEN Whistleblower Service. This whistleblower reporting service is provided by an independent third party and is currently managed by Deloitte.

You can contact the BEN Whistleblower Service through any of the methods set out below.



Online

Use the Online Report Form <http://speakingup.deloitte.com.au>

The form contains step by step instructions to assist you in making your disclosure.



Email

speakingup@deloitte.com.au



Phone

BEN Whistleblower Hotline - toll free
1800 223 150



Post

BEN Whistleblower Service
Reply Paid 12628,
A'Beckett Street, Melbourne, Victoria, 8006

2.1.2 Choosing to remain anonymous

Whether you want to stay anonymous or not when you contact the BEN Whistleblower Service is up to you. The Group recognises that maintaining confidentiality is important to the integrity of the whistleblower concerns process and to protect the welfare of people making reports.

The BEN Whistleblower Service will keep any information you give about yourself confidential within the BEN Whistleblower Service. However, the BEN Whistleblower Service will disclose it if required by law to do so.

If you do decide to remain anonymous, please be aware that this may impact on the Group's ability to investigate your concern.

2.1.3 Process: The BEN Whistleblower Service

The following outlines the process when a whistleblower concern is made to the BEN Whistleblower Service:

- Telephone calls to the BEN Whistleblower Service are not recorded, nor is there a caller ID to identify the call. Your whistleblower concern will be known only by a reference number unless you choose to tell the BEN Whistleblower Service your name.
- Tell the BEN Whistleblower Service as much as you can about the suspected misconduct. For example:
 - specific nature of the concern being raised;
 - details of the person/people you think engaged in the relevant conduct- details of anyone else aware of, or involved in the matter including names of any witnesses;
 - date, time and location of the misconduct;
 - any supporting information details of any proof;
 - money or assets involved; and
 - how often you think the incident has happened.

Bendigo bank investigators may seek additional information utilising the BEN whistleblower service as an intermediary.

- The BEN Whistleblower Service will advise you of the protections available under the legislation.
- The information will be provided to the Whistleblower Program Office at Bendigo and Adelaide Bank.
- If you provide your name and contact details, this information will only be known to those required to have this information to investigate the matter.
- If you choose to remain anonymous, feedback will be made available on the BEN Whistleblower Service portal, which you can access using the case ID and your password, which you will receive at the end of lodging your initial whistleblower concern.
- You always have the option of providing additional information or making note of any concerns of adverse treatment, via the BEN Whistleblower Service portal once you have logged in.

2.2 Reporting to Eligible Recipients

If the above options for raising your whistleblower concern are not available for any reason, you can also contact an 'Eligible Recipient'. Our Eligible Recipients are:

- Directors;
- Executives;
- The auditor of any Group company, or a member of the audit team conducting the audit (both internal and external auditors);
- The Company Secretary;
- Head of Security & Investigations (Financial Crime Risk); and
- Manager Internal Investigations (Financial Crimes)

You can do this by:

- Speaking with them in person or by phone; and
- Before disclosing your whistleblower concern, inform the Eligible Recipient that you would like to raise a whistleblower concern under this policy.

An Eligible Recipient may direct you to raise your whistleblower concern via our external whistleblower service, or to the Whistleblower Program Officer, if they consider it appropriate.

If an Eligible Recipient is the subject of your whistleblower concern, or if you have another reason to believe that the Eligible Recipient is not likely to deal with your concern properly, then report your concern via the BEN Whistleblower Service as outlined above.

2.2.1 Reporting directly to the Whistleblower Program Officer (also an Eligible Recipient)

If you can't report your whistleblower concern externally, you can raise the suspected misconduct directly with the Whistleblower Program Officer. You can do this by:

- Speaking with the Whistleblower Program Officer in person or by phone; and
- Before disclosing your whistleblower concern, inform the Whistleblower Program Officer that you would like to raise a whistleblower concern under this policy.

Note: The Whistleblower Program Officer is the Head of Reward, Performance and Governance.

2.2.2 Obligations of an Eligible Recipient

Eligible Recipients must treat all Whistleblowing reports seriously and in confidence.

Eligible Recipients must not disclose the report or any information about it to anyone outside the Whistleblowing Program Office, without the consent of the Whistleblower.

The Whistleblower's identity must be protected and can only be disclosed with the Whistleblower's consent. All reasonable steps should be taken to prevent someone outside the Whistleblower Program Office from working out the Whistleblower's identity.

The Whistleblower must also be protected from Detriment, as a result of reporting the matter.

2.2.3 Other ways you can raise your whistleblower concern

Nothing in this policy is intended to limit you from disclosing Reportable Conduct or providing information to a Legal practitioner, government agency, law enforcement body or a regulator in accordance with any relevant law, regulation or prudential standard as well as journalists and members of the Commonwealth, state or territory parliaments (Parliamentarians), under certain circumstances.

You may also qualify for protection if you are an Eligible Whistleblower and choose to make an Emergency Disclosure or a Public Interest Disclosure - these terms are defined in the 'Definitions' section of this policy. Specific criteria apply when raising your concern under either of these methods of disclosure, and it is recommended

that you contact an independent legal advisor before making an Emergency Disclosure or a Public Interest Disclosure.

3 Investigation protocols

Policy Principle

The investigation process will differ depending on the nature of the suspected misconduct being investigated. It may be a formal in-depth investigation, or a broad review or audit on the subject matter or the work area disclosed. The purpose of the investigation is to determine if whistleblower concerns are substantiated, with a view to the Group then remedying any misconduct uncovered, where practical.

- When you raise a whistleblower concern, the relevant Whistleblower Investigator will undertake an initial assessment to determine whether the disclosure qualifies for protection and a formal, in-depth investigation is required. In circumstances where it may be unclear whether your disclosure qualifies for protection, we may decide to treat you as if you were protected as a whistleblower.
- If the disclosure qualifies for protection and requires investigation, the Whistleblower Investigator will then investigate the concern or review or audit the suspected misconduct as appropriate. Where necessary, an external expert may also be engaged to assist. Where the concern involves senior members of the Bank, or where the Whistleblower Program Officer and/or Whistleblower Investigator deems it necessary, external independent investigators may be engaged to perform the investigation.
- All investigations will be conducted in a fair, objective and independent manner and all reasonable efforts will be made to preserve confidentiality.
- To avoid putting an investigation at risk, if you raise a concern under this Policy you are required to keep that fact confidential (subject to any legal requirements).
- If you provide your details, feedback will be provided initially within seven days and then regularly while the investigation is in progress, with a further update when the investigation has been finalised.

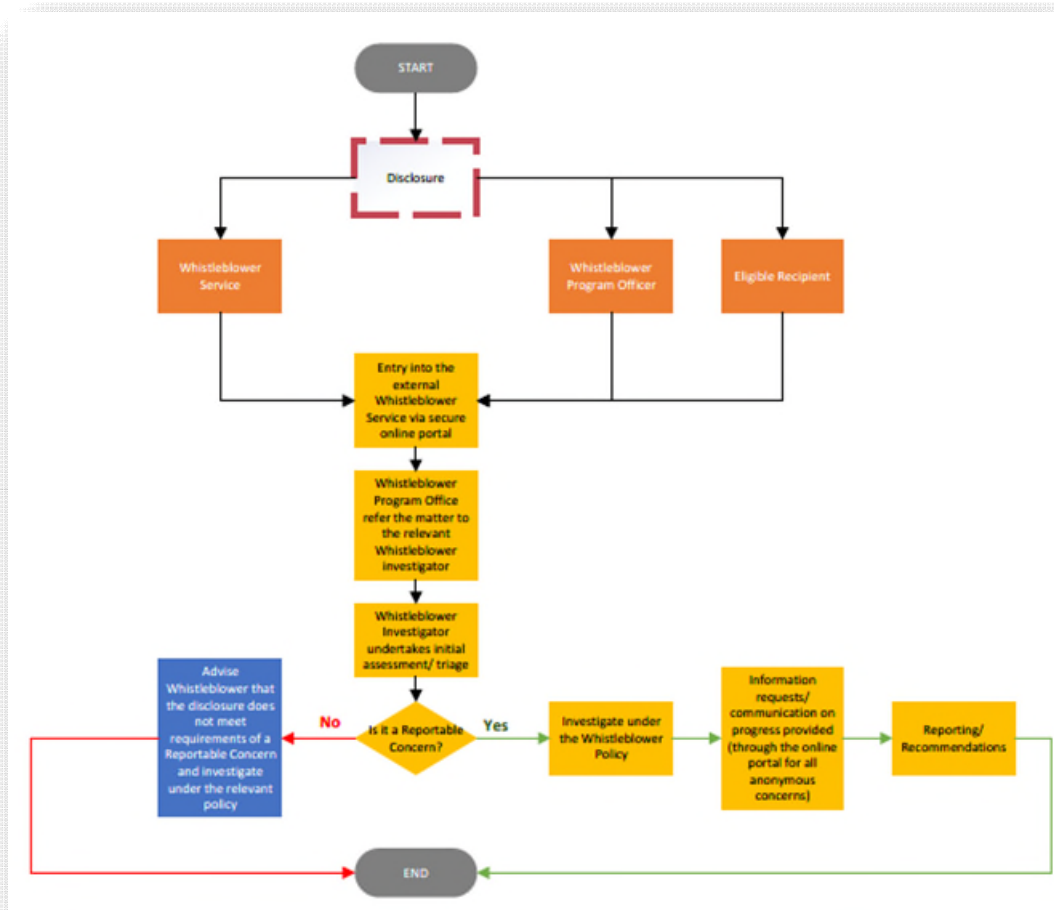
Please note that there may be circumstances where it may not be appropriate to provide you with details of the outcome.

- If you choose to remain anonymous, feedback will be made available on the BEN Whistleblower Service portal, which you can access using the case ID and password given to you at the end of lodging your initial whistleblower concern.
- If you choose to remain anonymous, your identity will not be disclosed to the investigator or to any other person. Information that is likely to lead to your identification may be disclosed without your consent, provided that:

It is disclosed for the purpose of reasonably investigating the whistleblower concern; and

All reasonable steps are taken to reduce the risk that you will be identified.

3.1 Reporting a whistleblower concern: process map



3.2 Whistleblower concerns that are substantiated

If the Whistleblower Investigator and / or Whistleblower Program Officer are satisfied on completion of an investigation that the whistleblower concern/s raised are substantiated, they may make recommendations for further action.

The Whistleblower Investigator and / or Whistleblower Program Officer will take the following into account when making recommendations:

- Where appropriate, develop recommendations in consultation with the relevant Executive.
- Aim to stop any substantiated misconduct which may be in breach of the law, our Code of Conduct or a Bendigo and Adelaide Bank policy.
- Aim to minimise any damage or loss to the Group as a result of the substantiated misconduct.

- Identify the action/s recommended to be taken.
- Consider appropriate legal action.
- Consider if information should be provided to the Group's insurers or other third parties.

3.3 Whistleblower concerns that are not substantiated

If the Whistleblower Investigator is satisfied that a whistleblower concern is not substantiated, they will make a recommendation of no action in relation to the whistleblower concern. The Whistleblower Investigator and / or Whistleblower Program Officer has discretion to make this decision without undertaking an investigation if the circumstances justify it.

If a report of a whistleblower concern is considered by the Whistleblower Investigator and/or Whistleblower Program Officer to have been deliberately false or misleading, and wasn't reported anonymously, the Whistleblower Investigator and/or Whistleblower Program Officer may recommend that disciplinary action be taken against the person raising the whistleblower concern. In this case the matter must be dealt with under the Disciplinary Policy (and any other relevant policies or procedures).

3.4 Reporting to third parties

In certain circumstances you may have a legal obligation to make a report to a third party, such as a statutory body or government department. You should make sure that you meet all reporting requirements. The Whistleblower Program Officer can advise you on these reporting obligations.

4 Support and Protections for Whistleblowers

Policy Principle

You will qualify for Whistleblower Protections if you are an Eligible Whistleblower.

4.1 Civil, criminal and administrative liability

A whistleblower will not be subject to any civil, criminal or disciplinary action for raising a whistleblower concern that is covered by this policy, or for participating in any subsequent investigation.

Provided you acted without malice, you are not liable for defamation.

However, this policy will not protect you if you are also involved in the reported misconduct or illegal activities, or if the whistleblower concern is deliberately false or misleading. Anyone who raises a whistleblower concern but is later found to have been involved in wrongdoing related to the concern, will not be protected in relation

to their role in the reported wrongdoing. However, in some cases the raising of the whistleblower concern may be a mitigating factor.

4.2 Confidentiality

If you choose to disclose your name, every effort will be made to protect your identity.

Information about your identity and information that is likely to lead to your identification may be disclosed in the following circumstances:

- Where the information is provided to ASIC, APRA or the Australian Federal Police;
- Where the information is disclosed to a legal practitioner for the purpose of obtaining legal advice in relation to the operation of applicable whistleblower protection laws; or
- Where you consent.

If your whistleblower concern relates to an allegation of suspected misconduct against a person, in most cases it will be necessary to disclose details about the whistleblower concern raised to the person against whom an allegation is made, to enable them to respond. In these circumstances, we will take all reasonable steps to reduce the risk that you will be identified. You may refuse to answer questions you feel could reveal your identity at any time, including during follow up conversations.

If it is not possible to keep your identity anonymous during the investigation, we will take all reasonable steps so that you will not be disadvantaged in your employment or arrangement with the Group.

It is illegal for a person to identify a whistleblower discloser or share any information that could lead to the identification of a discloser, outside of the above circumstances. You can lodge a complaint about an actual or suspected breach of confidentiality by contacting the Whistleblower Program Officer, or by lodging your complaint with ASIC, APRA or the ATO for investigation.

4.3 No Detriment

You will be protected from actual or threatened Detriment as a result of raising a whistleblower concern or potentially raising a whistleblower concern. You will be protected from victimisation – victimisation may include termination of employment, a reduction in your terms and conditions of employment, demotion, unfair or unequal treatment in the workplace, or if you are a supplier, cancellation of your contract.

Retaliation in any form against an individual who reports suspected misconduct under this policy (even if the whistleblower concern turns out to be mistaken) or who helps in the investigation of a whistleblower concern, will not be tolerated and will be treated as a breach of this policy and the Code of Conduct.

You will not be protected from actions that are not detrimental conduct. Examples of activities that are not detrimental conduct include management of unsatisfactory work performance, as long as the action is consistent with our Performance Counselling Policy, or actions that are undertaken to protect you from Detriment – such as changing your usual work location.

If you have raised a whistleblower concern and believe you have been or are likely to be disadvantaged in any way by an employee, including your manager, director or third party because you have done so, please contact the Whistleblower Program Officer for assistance. The Whistleblower Program Officer has specific responsibilities including protecting those who raise a whistleblower concern under this policy.

Note: The Whistleblower Program Officer is the Head of Reward, Performance and Governance.

You may also seek independent legal advice or contact a relevant regulatory body (such as ASIC, APRA or the ATO), if you think you have suffered Detriment.

4.4 Support for whistleblowers

We understand that raising a whistleblower concern can be stressful and difficult. Whistleblowers are encouraged to make use of the Employee Assistance Program, a confidential counselling service available to all employees of the Group, at any time.

You may also contact the Whistleblower Program Officer, who may appoint an independent support person from the People and Culture team to assist you in managing your health and wellbeing. Be aware that this action may require you to consent to disclosure of your identity, or information that could lead to the disclosure of your identity.

Anonymous whistleblowers should proactively report any adverse treatment experienced by them, so the Group can take immediate steps to rectify this.

4.5 Compensation

You, or any other staff member or individual, can seek compensation and other remedies through the courts if you believe you have:

- suffered loss, damage or injury because of a whistleblower concern you have raised; and
- the Group failed to take reasonable steps to prevent the detrimental conduct that you have experienced.

In these circumstances, we encourage you to obtain independent legal advice.

5 Implicated Employee Protection

Policy Principle

Whistleblower Investigators must take reasonable steps to protect the confidentiality of Whistleblowers and implicated employees, and adequate support should be provided to both the Whistleblower and implicated individuals (as relevant).

5.1 Confidentiality

Whistleblower Investigators must take reasonable steps to protect the confidentiality of the person who is the subject of the whistleblower concern during the assessment and investigation process.

Note: This includes through the processes described above in relation to records.

If an investigation does not substantiate the suspected misconduct, the fact that the investigation has been carried out, the results of the investigation, and the identity of the person who is the subject of the whistleblower concern will be kept confidential.

5.2 Information sharing

Subject to any privacy, confidentiality and other legal considerations, if the Whistleblower Investigator conducts an investigation or appoints an external investigator, the Whistleblower Investigator will make sure the person who is the subject of the investigation:

- is informed of the substance of any allegations;
- is entitled to respond to any allegations;
 - has their position or circumstances set out fairly in any report by the Whistleblower Investigator; and
- is informed of the outcome of any investigation including the adverse recommendations (for example, disciplinary action) where the misconduct is substantiated.

5.3 Support for implicated individuals

The Group also recognises that a person who is the subject of a whistleblower concern should be supported during the handling and investigation of the suspected misconduct.

Staff who are the subject of a whistleblower concern are encouraged to make use of the Employee Assistance Program at any time.

They may also contact the Whistleblower Program Officer, who may appoint an independent support person from the People and Culture team to assist in managing the employees' health and wellbeing.

6 Reporting

Policy Principle

The Whistleblower Program Office is to undertake regular reporting on conduct, including statistics and trends, as well as consider the operation and effectiveness of the Whistleblower Policy for consideration by the Executive Committee, Board People Culture and Transformation Committee and Board Audit Committee.

7 Access to the policy

Policy Principle

This policy will be made available on the internal Group intranet (BENnet) and the Bendigo and Adelaide Bank public website.

8 Key roles and responsibilities

Role	Responsibility
Whistleblower Program Officer - Head of Reward, Performance and Governance	• Oversight or the protection of any person who reports a concern. • Promote a culture that encourages open and confidential reporting of concerns. • Ensure there is staff and third-party awareness of the policy, its requirements and protections. • Oversight of the effective functioning of the Whistleblower Policy. • Make related recommendations to the Executive Committee and Board Committee, as relevant. • Obtain expert, independent advice on any area relevant to the operation of the Whistleblower Policy. • Ensure that the BEN Whistleblower Service is conducted in accordance with the Whistleblower Policy. • The contact point for the BEN Whistleblower Service if the report involves a concern about a Whistleblower Investigator. • Overarching role with visibility of all individual cases, who can follow up as required, talk to investigators • internally, and act as the contact with the external Whistleblower Service provider (Deloitte). • Oversee training for staff and eligible recipients.

Whistleblower Investigator**Financial Crimes**

Head of
Financial Crime
Risk
Head of Security
and Investigations
Manager
Internal
Investigations

People and Culture

Head of
Employee
Relations
Senior Manager
Employee
Relations

Corporate Secretariat

Company
Secretary

Group Legal

Senior Legal
Counsel

An Investigator must be suitably trained and have demonstrated competence and experience in conducting investigations.

- Receive notification of reports from the Whistleblower Program Officer.
- Carry out investigations into whistleblower concerns referred to them, in accordance with any directions by the Whistleblower Program Officer, and any BEN policies.
- Report to the Whistleblower Program Officer, including providing investigation reports and recommendations.
- Provide advice and assistance to people on the process for reporting concerns.
- Impartially assess each whistleblower concern referred to them, including deciding whether an investigation is appropriate.
- Provide protection to a person raising a whistleblower concern (e.g., in relation to confidentiality and record management, the welfare of the person and keeping the person informed).
- If the BEN Whistleblower Service received the initial report, provide regular status reports to the BEN Whistleblower Service to enable communication between the BEN Whistleblower Service and the reporting person, subject to privacy, confidentiality and other legal considerations.
- If necessary, seek assistance of specialist advisers as required such as People and Culture, the police, legal and forensics advisers.
- As appropriate, liaise with the Whistleblower Program Officer.

Eligible Recipients

- Receive whistleblower concerns and obtain consent from the whistleblower (where possible or relevant) and refer the whistleblower concern to the BEN Whistleblower Service.
- Maintain confidentiality about whistleblower concerns received, in accordance with this policy.
- Immediately report any concerns in relation to any detrimental conduct to the Whistleblower Program Officer.
- Complete any training as required.
- Where Eligible Recipients are members of Corporate Secretariat or Group Assurance teams, the Heads Of these teams are responsible for contacting the Whistleblower Program Officer to arrange training for new staff and/or refresher training.

Leaders

Where appropriate, leaders should be consulted in the handling of concerns.

The role of a leader, where the leader is not the subject of the whistleblower concern or implicated in the matter reported, includes the following:

- Assist the Whistleblower Investigator by providing access to information, employees or premises as needed.
- Maintain confidentiality in relation to any relevant information as well as the identity of a reporting person, the subject of a whistleblower concern, the Investigator and any witnesses.
- Secure relevant documentation, information or other evidence under their control, as requested.
- Confer with the Whistleblower Program Officer and / or Investigator in developing appropriate recommendations regarding the outcome of any investigation.

Employees and Officers

- Employees and officers are expected to report whistleblower concerns regarding suspected misconduct.
- All employees and officers have an important role to play in supporting those who have raised a whistleblower concern. They must not cause Detriment to any person because of raising a whistleblower concern.
- All employees and officers should maintain the confidentiality of a person they know or suspect to have made a disclosure.

Board People, Culture and Transformation Committee

- Provide oversight over the effectiveness of the implementation of this policy.
- Ensure that the Group establishes and maintains policies and procedures for employees to submit, confidentially, information about accounting, internal control, compliance, audit, and other matters about which the employee has concerns.
- This includes ensuring that there is a process for ensuring employees are aware of these policies and for dealing with matters raised by employees under these policies.

Board Audit Committee

- Ensure that the Group establishes and maintains policies and procedures for employees to submit, confidentially, information about accounting, internal control, compliance, audit, and other matters about which the employee has concerns.
- This includes ensuring that there is a process for ensuring employees are aware of these policies and for dealing with matters raised by employees under these policies.

**Whistleblower
Program Office**

- Support the effective functioning of the Whistleblower Policy
- Monitor the BEN Whistleblower Service to ensure it is conducted in accordance with the Whistleblower Policy.
- Support role with visibility of all individual cases, who can follow up as required, talk to investigators internally, and act as the contact with the external Whistleblower Service provider (Deloitte).
- Develop training modules for staff and eligible recipients.
- Acknowledge and allocate Whistleblower Concerns to relevant Whistleblower Investigators
- Engage Legal to obtain advice if relevant.
- Escalate matters to the Whistleblower Program officer or the Chief People Officer if relevant.