

Objective

Suncorp is committed to fostering a culture of honest and ethical behaviour. Suncorp recognises the importance of ensuring a safe, supportive and confidential environment where People feel confident about reporting wrongdoing and are supported and protected throughout the process. This process supports Suncorp's focus on responding to concerns raised and evidences a continuous improvement culture.

This Policy establishes the minimum requirements for:

- encouraging, supporting and promoting the appropriate raising of Reportable Conduct;
- ensuring Suncorp has independent, confidential and objective reporting and investigation mechanisms so that People, acting honestly, ethically and with genuine concern are able to raise Reportable Conduct without fear of reprisal;
- ensuring that protections and protocols are in place to support People who raise Reportable Conduct;
- conducting fair, unbiased, evidence-based investigations in order to substantiate or refute claims of Reportable Conduct; and
- implementing a robust and trusted framework for escalating and addressing claims of Reportable Conduct.

Application

This Policy applies to People/Persons as defined in the [Key Terms](#) in this Policy.

In addition, where Suncorp relies on an external organisation to manage aspects of the Whistleblower process on Suncorp's behalf, Suncorp will make the external organisation aware of the requirements of this Policy.

The Addendum only applies to disclosures made in Australia.

To the extent that this Policy imposes obligations on Suncorp, it does not form a contractual term, condition or representation.

Policy Statements

1. Suncorp must foster a culture that promotes the raising of Reportable Conduct

Suncorp supports and values People to raise Reportable Conduct. In raising Reportable Conduct, a Person should ensure they are acting honestly, reasonably and with genuine belief as to the matters raised. If a Person is unsure as to whether conduct constitutes Reportable Conduct, they can seek guidance from the Whistleblower Protection Officer.

Suncorp will include its Whistleblower Policy on its website and make it available to Suncorp's Officers and Employees on the Suncorp intranet, together with details of how to raise Reportable Conduct.

Suncorp will build awareness amongst Employees, Officers and External Workers including as to what constitutes Reportable Conduct and how to raise it and, for leaders, guidance on how to respond if they receive a disclosure. Specialist training will be provided to Employees and Officers responsible for implementing this Policy.

2. Suncorp must provide appropriate channels which support the raising of Reportable Conduct

Suncorp will have an easily accessible and flexible process in place for raising Reportable Conduct. Suncorp enables Reportable Conduct to be raised by any of the following avenues:

- Via the Suncorp Whistleblower Service (an independent and confidential channel);
- By an Employee directly to a leader (including a Function CEO);
- Directly to the Whistleblower Protection Officer;
- Directly to the individual holding the following positions:
 - Head of Tax;
 - Executive General Manager Internal Audit;
 - Applicable Suncorp Appointed Actuary;
 - Office of the Superannuation Trustee (Australia) if the matter relates to superannuation;
- Directly to the applicable External Auditor of Suncorp;
- Directly to an external Legal practitioner for the purpose of obtaining legal advice or legal representation about whistleblower laws; or
- Directly to the regulator or in the case of Reportable Conduct in New Zealand, to the Appropriate Authority (provided the requirements in the Protected Disclosures Act are met).

The Suncorp Whistleblower Service is managed by a third party (Deloitte) with the option of the Discloser remaining anonymous. Contact details are below.

Phone	Australia: 1800 444 774 New Zealand: 0800 202 643 Outside of Australia or New Zealand: +61 3 9667 3727 (International call rates apply)
Mail	Australia: Reply Paid 12628 A'Beckett Street, Melbourne, VIC 8006 New Zealand: PO BOX 912028 Victoria Street West, Auckland 1142 New Zealand
Web	www.suncorp.deloittedigital.com
Email	suncorp@deloittedigital.com
Fax	613 91 8182

3. Suncorp must take appropriate steps to protect and support a Person who raises Reportable Conduct

Suncorp must ensure that where an allegation of Reportable Conduct is raised, steps are taken to ensure the Discloser will not be personally or financially disadvantaged by reason of having made the disclosure. Suncorp will ensure that all reasonable steps are taken to protect the Discloser (and those responsible for the associated investigation and support) from any threatened or actual Detrimental Conduct in Australia or Retaliatory Action in New Zealand as a result of raising Reportable Conduct.

Where the Discloser, or someone responsible for the investigation and support, believes they are, or may be, subject to Detrimental Conduct in Australia or Retaliatory Action in New Zealand they should raise this in the first instance with the Whistleblower Protection Officer directly or through the Suncorp Whistleblower Service (Deloitte). If they are not satisfied with the response, they can escalate to the Whistleblower Executive Champion.

Suncorp will provide support to a Discloser as required, including but not limited to, via the Whistleblower Protection Officer, the Employee Assistance Program (EAP) or further reasonable assistance as requested by the Discloser.

The Discloser may also be entitled to protection from civil, criminal, or administrative liability (in Australia, under the Corporations Act 2001) or civil, criminal or disciplinary proceedings (in New Zealand, under the Protected Disclosures Act 2000) if the Reportable Conduct they raise qualifies as a Protected Disclosure. While some guidance can be provided by Suncorp's Whistleblower Service (Deloitte) and the Whistleblower Protection Officer, the Person should seek independent legal advice prior to making a disclosure where any doubt exists as to whether the Reportable Conduct may be considered as a Protected Disclosure.

The Discloser may not be protected if:

- they knowingly give false or incorrect information and/or make vexatious claims; or
- they are found to have been materially involved in wrongdoing which constitutes misconduct or is unlawful in nature, and therefore may not be protected in relation to their role in that wrongdoing (although in some cases the making of a report may be a mitigating factor).

The Discloser may also communicate with an applicable regulator at any time in relation to Reportable Conduct.

4. Suncorp must maintain the confidentiality, anonymity and privacy of the Person raising a whistleblower disclosure and securely store all records

A Person may make a whistleblower disclosure anonymously. Their identity will be protected unless the Person consents to the disclosure of their identity, or if Suncorp has been compelled or permitted by law, regulatory obligations or broader external requirement to disclose their identity.

Suncorp must establish appropriate procedures to ensure that all disclosures made via the whistleblower channel regardless of whether they are assessed as Reportable Conduct, are treated confidentially and securely. Information may be disclosed on a confidential basis to those assisting or otherwise involved in the investigation, while continuing to maintain confidentiality and protections, for the following purposes:

- assessing whether the allegation is Reportable Conduct under this Policy (including to a subject matter expert engaged to understand the nature of the reported conduct);
- investigating an allegation or making a determination in relation to the allegation (including to an investigator or parties allegedly involved in Reportable Conduct);
- obtaining independent financial, legal and/or operational advice as required.

Further, the Discloser may acknowledge and consent to their name and contact details being disclosed to the Whistleblower Protection Officer and for the purpose of the investigation any time during the process.

Suncorp must have procedures in place to ensure that all records relating to investigations of Reportable Conduct are retained in a secure platform by the area accountable for the investigation for seven (7) years.

5. Suncorp must ensure that all whistleblower investigations are conducted fairly, objectively, without bias and in a timely manner

Where an investigation is required, Suncorp will appoint a Whistleblower Investigation Officer who will conduct an objective, fair, independent and evidence-based investigation process, and for Australia, consistent with the requirements outlined in the Addendum to this Policy. To ensure the fair treatment of Employees and other individuals mentioned in the disclosure, the Whistleblower Investigation Officer will be independent from the area of the business involved and have the required skill to manage and investigate the conduct raised. The Whistleblower Investigation Officer may, at times, draw on a specialist skill set from another part of the business that is independent of the area of the business involved. Suncorp will take reasonable steps to ensure investigations are conducted in a timely manner. Suncorp will ensure the individual against whom the allegation is made is provided with the right of response where the allegation is substantiated or partially substantiated.

Suncorp will take reasonable steps to ensure a Discloser receives acknowledgement of their disclosure, is kept updated in relation to timeframes and next steps and is advised when the matter is closed (where appropriate).

6. Suncorp must establish appropriate support, governance and reporting procedures for whistleblower disclosures

Suncorp must ensure that it is adequately resourced and supported, including the appointment of appropriately qualified individuals to act as a:

- Whistleblower Executive Champion; and
- Whistleblower Protection Officer.

Such support includes the ability for the Whistleblower Executive Champion and Whistleblower Protection Officer to have direct, unrestricted access to independent financial, legal and operational advisers as required.

The role of the Whistleblower Executive Champion is to oversee the overall effectiveness of the Whistleblower program and ensure it delivers on the objectives as outlined in this Policy. In doing so, Suncorp will ensure mechanisms are in place to monitor the effectiveness of the program, which may include the use of an independent assessment, with actions taken to embed improvements as a result of these findings.

The Whistleblower Protection Officer ensures that the requirements outlined in this Policy are met with a focus on reviewing the disclosures received and protecting the Discloser.

Suncorp will establish appropriate procedures to report on trends and provide a summary of all whistleblower disclosures made to the Board, while still protecting anonymity where requested. Findings will be utilised to continuously improve processes, procedures, culture and awareness.

Roles and Responsibilities

People/Person

- Be familiar with, and always act in accordance with, the approach developed to raise Reportable Conduct.
- Act honestly, reasonably and with genuine belief when raising an allegation of Reportable Conduct.

Whistleblower Executive Champion

The Whistleblower Executive Champion is the Chief Risk Officer (or delegate) and is responsible for monitoring the overall effectiveness of the Whistleblower Policy, including responding to escalations and acting as an executive sponsor.

Whistleblower Protection Officer (“WPO”)

The WPO is usually the Executive Manager Compliance Governance and Reporting (or delegate) and is responsible for taking steps, so far as is reasonably practicable, to protect Disclosers, and for the implementation of the Whistleblower Policy.

The WPO will:

- In respect of disclosures referred to the WPO:
 - Provide assistance to a Whistleblower (before or after they report) in relation to the process and this Policy;
 - Consider whether the conduct raised amounts to Reportable Conduct and where it clearly does not, inform the person who raised the conduct of any other steps outside of the Whistleblower process that can be taken to address the allegations; and
 - Enable the investigation of Reportable Conduct;
- Maintain the confidentiality, privacy, and anonymity (as required) of the Discloser;
- Report investigation updates and the outcome to the Discloser;
- Promote awareness of this Policy and the raising of Reportable Conduct by integrating the information into Employee training and induction programs; and
- Report on trends and provide a summary of all disclosures to the Board while maintaining the confidentiality and anonymity of the Discloser as required.

Whistleblower Investigation Officer

Following appointment, conduct an evidence-based investigation process consistent with the requirements outlined in Addendum to this Policy.

Suncorp Whistleblower Service

The Suncorp Whistleblower Service is administered by an external company which Suncorp has engaged to act on its behalf. The Suncorp Whistleblower Service (Deloitte) will:

- Refer Reportable Conduct raised to the Whistleblower Protection Officer; and
- Maintain the confidentiality, privacy and anonymity (as required) of the Discloser.

Policy Exemptions

No exemptions apply to this Policy. Country level policies should only be developed where there are local legal or regulatory requirements to do so.

Policy Breaches

All Policy breaches must be recorded in IRIS in accordance with the Incident Management Standard, with the Policy Owner notified. Non-compliance with this Policy may result in disciplinary action (including termination of employment).

Key Terms

Unless otherwise defined in this Policy, commonly used terms and phrases are defined within the Standard Definition Document.

Appropriate Authority	<p>For New Zealand reporting, as defined by the Protected Disclosures Act 2000 includes:</p> <ul style="list-style-type: none">– the Commissioner of Police;– the Controller and Auditor-General;– the Director of the Serious Fraud Office;– the Inspector-General of Intelligence and Security;– an Ombudsman;– the Parliamentary Commissioner for the Environment;– the Independent Police Conduct Authority;– the Solicitor-General;– the State Services Commissioner;– the Health and Disability Commissioner;– the head of every public sector agency; and– a private sector body which comprises members of a particular profession or calling and which has power to discipline its members (does not include (i) a Minister of the Crown; or (ii) a member of Parliament). <p>Protected Disclosures can be made to an Appropriate Authority if it is reasonably believed:</p> <ul style="list-style-type: none">– the head of the organisation is involved in the serious wrongdoing;– it is justified because an urgent or exceptional circumstance; or
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- a disclosure is made in accordance with internal procedures, but there has been no action or recommended action within 20 working days.

Detrimental Conduct

Conduct that results in detriment, including any of the following:

- (a) dismissal of an Employee;
- (b) injury of an Employee in his or her employment;
- (c) alteration of an Employee's position or duties to his or her disadvantage;
- (d) discrimination between an Employee and other Employees of the same employer;
- (e) harassment or intimidation of a Person;
- (f) harm or injury to a Person, including psychological harm;
- (g) damage to a Person's property;
- (h) damage to a Person's reputation;
- (i) damage to a Person's business or financial position; or
- (j) any other damage to a Person.

Detrimental Conduct does not include:

- Any performance management activity that is instigated due to unsatisfactory work performance, in accordance with Suncorp's performance management processes; or
- Any action taken that has been done for the purpose of protecting the Discloser from detriment e.g., moving the Discloser from their immediate work environment.

In the event that administrative or management action is taken, Suncorp will ensure that the Discloser understands the reason for such action.

This definition only applies in relation to disclosures in Australia.

Discloser

A Person who raises an allegation of Reportable Conduct.

People / Person

Any current or former:

- Officers, Employees, External Workers, Auditors, Suppliers or associates (within the meaning set out in the Corporations Act) of Suncorp; and
- relatives of someone referred to above, or a dependent of someone referred to above or that Person's spouse.

Personal Work-related Grievance

Information disclosed relates to a Personal Work-Related Grievance if the information concerns a grievance about any matter in relation to employment, or former employment, having (or tending to have) implications for the Person, but does not have

significant implications for Suncorp or related entities.

Examples of Personal Work-Related Grievance, impacting the Person raising the issue may include:

- An interpersonal conflict;
- A complaint about performance or reward review outcome;
- A grievance about a recruitment decision;
- A complaint about any disciplinary action taken or proposed to be taken against the Person; or
- A decision relating to the engagement, transfer or promotion.

Protected Disclosure

A Person's protection against civil, criminal, administrative or disciplinary proceedings for a disclosure made in accordance with the requirements stipulated in the Corporations Act 2001 (Australia), Protected Disclosures Act 2000 (New Zealand) or other relevant legislative provision. For a disclosure to qualify as a Protected Disclosure, the Person making the disclosure must, among other things:

- be an Employee of the company the disclosure is about (defined in Australia by the Corporations Act 2001 and in New Zealand by the Protected Disclosures Act 2000 as applicable); and
 - In Australia:
 - make the disclosure in accordance with the provisions of the Corporations Act;
 - have reasonable grounds to suspect that the relevant information:
 - indicates that a company, a related body corporate, or an Officer or Employee of such entities, has engaged in conduct that constitutes an offence against certain specified Commonwealth laws, or which represents a danger to the public or financial system; or
 - concerns misconduct or an improper state of affairs or circumstances in relation to a company or a related body corporate; and
 - ensure the information being disclosed is not protected by legal professional privilege.
 - In New Zealand:
 - the information is about 'serious wrongdoing' (as defined in the Protected Disclosures Act 2000 New Zealand) in or by that organisation; and
 - the Employee believes on reasonable grounds that the information is true or likely to be true; and
 - the Employee wishes to disclose the information so that the 'serious

wrongdoing' can be investigated; and

- the Employee wishes the disclosure to be protected.

Reportable Conduct

An activity, conduct or state of affairs that has occurred, is currently occurring or is likely to occur and could be considered to be:

- Illegal;
- Unethical;
- Improper;
- An activity that could or will lead to unsafe work practices, environmental or health risks;
- A breach of any legislation or internal policy, including the Suncorp Group Enterprise Agreement and Code of Conduct;
- An intentional disclosure or misuse of commercially sensitive information;
- An activity that is inconsistent with Suncorp's commitment statement on sustainability;
- Any other conduct, deliberate or otherwise, that may cause material financial or non-financial loss to Suncorp or otherwise be materially detrimental to the interests of Suncorp including tax affairs; and
- For New Zealand Persons, without limiting the above definitions, any conduct that constitutes "serious wrongdoing" under the Protected Disclosures Act 2000.

Reportable Conduct is **not** conduct which you would expect to arise in the normal course of business or which relates to a Personal Work-related Grievance. However protections may apply in accordance with Section 5 of the Addendum.

Retaliatory Action

Action made against a Discloser by an Employee, Officer or External Worker of Suncorp that may give rise to a personal grievance or unjustifiable dismissal claim. Examples include victimisation, harassment, intimidation, discrimination, demotion, dismissal and current/future bias.

This definition only applies to disclosures in New Zealand.

Addendum – Whistleblower Policy Australian jurisdiction

1. Scope

This Addendum expands on Suncorp’s Whistleblower Policy providing further detail for the Australian jurisdiction only. The Policy and Addendum have been developed having regard to the requirements of the Corporations Act (2000), ASIC Regulatory Guide 270 – *Whistleblower Policies*, and the *ASX Corporate Governance Principles and Recommendations 4th Edition* and should be read and applied in accordance with the [Code of Conduct](#). Key terms contained in the Whistleblower Policy also apply to this Addendum.

The Suncorp Whistleblower Policy and this Addendum do not apply to disclosures relating to Personal Work-Related Grievances and these disclosures will be directed to the Complaints and Investigations Guideline, unless the exceptions listed in *Section 5: Protections from Detrimental Conduct* apply.

Allegations of internal fraud and bribery and corruption can be disclosed directly to Group Internal Fraud, or reported under Suncorp’s Whistleblower Policy.

For further information on the types of disclosures that can be reported under Suncorp’s Whistleblower program refer to the definition of Reportable Conduct.

2. Making a disclosure

WP.01 Suncorp understands that sometimes making a disclosure of wrongdoing can be difficult due to the nature of the disclosure or the fear of reprisal. To encourage disclosures to be made, Suncorp has implemented a Whistleblower Policy that is available for People who have a direct or indirect relationship with Suncorp.

Prior to making a disclosure the Person may wish to seek further information to ensure they are fully informed. While some guidance can be provided by Suncorp’s Whistleblower Service (Deloitte) and the Whistleblower Protection Officer, the Person may wish to seek independent legal advice.

A Person seeking to disclose a concern that constitutes Reportable Conduct can do so via the avenues referred to in the Whistleblower Policy. Evidence that the Reportable Conduct has occurred is not required, but the disclosure should be made honestly, reasonably, and with genuine belief that the concern is warranted.

WP.02 During the disclosure process, providing as much information as possible will, if available, allow the investigation to be conducted in an efficient and fulsome manner, including:

- A detailed description of the incident that outlines all salient facts, background information and key issues;
- Date(s) or time period that the incident occurred or is likely to occur;
- Whether the issue is a once-off incident or is ongoing;
- Whether any other people are aware of or witnessed the incident.

If relevant:

- The Function/Area/Team in which the incident has or is likely to occur;
 - Whether the Employee has raised the issue within their line management structure and if so, the management response;
 - If the issue has been raised with any other person;
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- The Person's name, Function/Area/Team and contact number (should the Person not want to remain anonymous); and
 - Any other information which is considered relevant.
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WP.03 An Emergency Disclosure or Public Interest Disclosure can be made to a parliamentarian or journalist. Refer to Section 11 – Key Terms for further information.

3. Receiving a disclosure

WP.04 Unless the disclosure is received by an external 3rd party, Suncorp's Whistleblower Service (Deloitte) will enter the disclosure into the secure and confidential database. The database will send an automated email notifying the Whistleblower Protection Officer that a disclosure has been lodged – no information about the disclosure is communicated in the email. Disclosures received by the Whistleblower Protection Officer (directly or indirectly via the reporting avenues outlined in the Whistleblower Policy) will be entered into the database.

If the allegation involves a Strategic Leader or a member of the Senior Leadership Team, the Whistleblower Executive Champion (Chief Risk Officer) will be notified provided the content of the disclosure does not indicate a conflict. If a conflict can be reasonably assumed the Chief People Experience Officer will be notified instead.

4. Protecting confidentiality and privacy

WP.05 A Person making a disclosure can determine to what degree they wish to remain anonymous, with consent obtained prior to their identity being disclosed, to either the recipient of the disclosure and/or the Whistleblower Protection Officer and/or the individual/s conducting the investigation.

WP.06 Unless the Person has chosen to be contacted for the purpose of the investigation, their personal information will not be shared during the investigation process. Internal reporting does not name or use information that would lead to the identity of the Person being known.

All materials relating to the disclosure are always to be handled confidentially and securely and reasonable steps will be taken to protect the identity of the Discloser including:

- redacting personal information;
 - destroying records related to investigations after 7 years (unless otherwise required);
 - using secure channels of communication during the investigation;
 - limiting access to disclosures to the Whistleblower Protection Officer and the Whistleblower Investigation Officer or, in the case of disclosures relating to SLT members, the Whistleblower Executive Champion; and
 - providing training or awareness to those involved in an investigation to ensure they understand their obligations in relation to maintaining confidentiality.
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WP.07 At no point during the investigation, should it be made known to witnesses, or individual/s against whom the allegation is made, that the investigation relates to a disclosure of Reportable Conduct under the Whistleblower Policy. It will be at the discretion of the Whistleblower Protection Officer and the Whistleblower Executive Champion, in consultation with People Experience, if specific individuals should be made aware that a disclosure has been made. The identity of the Discloser will be not made known beyond the scope of consent obtained by the Discloser unless it is:

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- a. to ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the Australian Federal Police Act 1979);
 - b. to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act); or
 - c. to a person or body prescribed by regulations.

Should the Discloser of Reportable Conduct believe their confidentiality has been breached, they may raise a complaint to a regulator such as ASIC, APRA or the ATO or may escalate internally to the Whistleblower Protection Officer or the Whistleblower Executive Champion for their investigation.

5. Protection from Detrimental Conduct

- WP.08 Suncorp aims to protect a Discloser from Detrimental Conduct by ensuring their confidentiality, anonymity and privacy is maintained throughout the disclosure, investigation and response process. Disclosures related solely to Personal Work-Related Grievances are not considered Protected Disclosures, unless:
- a. it includes information about misconduct, or information about misconduct includes or is accompanied by a Personal Work-Related Grievance (mixed report);
 - b. Suncorp has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
 - c. the Discloser suffers from or is threatened with detriment for making a disclosure; or
 - d. the Discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

Any concerns that the Discloser may be subject to Detrimental Conduct should be raised immediately to the Whistleblower Protection Officer, either directly or through Suncorp's Whistleblower Service (Deloitte). If the response to these concerns is deemed unsatisfactory, this can be escalated to the Whistleblower Executive Champion. The Discloser can also contact the applicable regulator should they suffer Detrimental Conduct.

- WP.09 Compensation and other remedies can be sought through the Courts should:
- the Discloser suffer loss, damage or injury due to the disclosure; and
 - Suncorp failed to take reasonable precautions and exercise due diligence to prevent the Detrimental Conduct.
- Seeking independent legal advice is encouraged should compensation or other remedies be sought. If a Discloser suffers Detrimental Conduct a court may make any of the following orders:
- a. an order requiring the payment of compensation for loss, damage or injury suffered as a result of the Detrimental Conduct;
 - b. an order granting an injunction to prevent, stop or remedy the effects of the Detrimental Conduct;
 - c. an order requiring a person to apologise for engaging in the Detrimental Conduct;
 - d. if the Detrimental Conduct related to termination of employment, an order requiring that a person be reinstated to a position or a position at a comparable level;
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- e. an order requiring the payment of exemplary damages; or
 - f. any other order the court thinks appropriate.
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6. Assessing the disclosure

WP.10 The Whistleblower Protection Officer has seven (7) calendar days from the lodgement date to respond and will act with a sense of urgency. During this time an assessment will be made as to whether the conduct, if proven, would constitute Reportable Conduct, seek further information to better understand the issue, and whether the Discloser, or anyone else mentioned in the disclosure is at risk of Detrimental Conduct.

In undertaking this assessment, information may be shared about the disclosure to specialist internal teams (including but not limited to People Experience, Legal Advisory, Internal Fraud) where it is likely an investigation will be undertaken.

All forms of communication between the Whistleblower Protection Officer and internal or external parties involved in the investigation must occur via a secure communication channel.

Where an assessment is made that a disclosure does not constitute Reportable Conduct, the Whistleblower Protection Officer will take steps to notify the Discloser of other mechanisms available to report the issue.

7. Selecting a Whistleblower Investigation Officer

WP.11 Where an investigation is required a suitable Whistleblower Investigation Officer will be identified to conduct an objective, fair and evidenced-based investigation. Based on the nature and information provided within the reported matter, this decision may be made by the Leader or Leader Once Removed of the individual/s the allegation of Reportable Conduct has been made against.

To ensure fair treatment of Employees and other individuals mentioned in the disclosure, the Whistleblower Investigation Officer:

- should be independent from the Business area involved, however, there may be times where a specialist skill set from the Business is required to support an investigation;
- is required to have the skills and expertise to manage and investigate the alleged conduct and should do so in a timely manner; and
- must advise the Whistleblower Protection Officer immediately where there is potential for a conflict of interest.

For all allegations of internal financial crime including fraud, theft, and bribery and corruption the Whistleblower Investigation Officer should be from Group Internal Fraud.

Where allegations of Reportable Conduct and a Personal Work-Related Grievance is disclosed together, a member of the People Experience team will be contacted to assist in the identification of an independent Whistleblower Investigation Officer.

8. Conducting the Investigation

WP.12 The investigation will be conducted in accordance with any relevant investigation policies/procedures. The quality of the investigation will be dependent on the amount of information

provided in the disclosure and the ability to obtain further information from the Discloser. The investigation process may be conducted by one or a combination of investigators depending on the nature of the disclosure, however, a primary Whistleblower Investigation Officer will be identified and accountable for the investigation.

The investigation must:

- be factual and focus on proving or disproving the alleged conduct or activity;
- be conducted independently and without bias;
- keep all details confidential;
- preserve the anonymity of the Discloser unless the Discloser has consented otherwise; and
- rely on the principles of natural justice (the person subject to the allegation be given the right to respond and be informed of the outcome where the allegation is substantiated or partially substantiated).

The extent to which the Whistleblower Investigation Officer will engage with witnesses or undertake additional enquiries will be dependent on the nature of the allegations.

Once an investigation commences, the Whistleblower Protection Officer will ensure the Discloser is kept informed on the progress of the investigation within twenty-eight (28) days from lodgement date, or earlier where possible.

WP.13 At any point during the investigation the Discloser can escalate to the Whistleblower Protection Officer or the Whistleblower Executive Champion if it is believed appropriate action is not being taken. Escalation may also be reported to an external authority or body including, but not limited to, the External Auditor, or the applicable regulatory body or authority.

WP.14 The person against whom an allegation has been made will generally not be made aware that a complaint has been made against them. For example, where an allegation does not proceed past the initial investigation stage (i.e. the matter is closed), advising the respondent may cause unnecessary stress and burden in circumstances where the allegation will not form the basis of any formal proceedings against the respondent.

9. Investigation findings

WP.15 The Whistleblower Investigation Officer must provide the Whistleblower Protection Officer with a summary report on the approach and outcome of the investigation via an approved secure communication channel as soon as practicable upon completion. The Whistleblower Protection Officer may seek further information should they not be satisfied with the scope of the investigation as outlined in the report.

10. Outcome and further action

WP.16 The Whistleblower Protection Officer will report the status and outcome of the investigation directly to the Discloser (if identity is known) or via Suncorp's Whistleblower Service (Deloitte). The outcome of the investigation will at a minimum indicate whether the disclosure has been substantiated, partially substantiated, or unsubstantiated. Other information may be provided to the Discloser subject to the requirements of the law, and the privacy of the individual/s against whom the allegation was made.

Depending on the findings of the investigation, People Experience will engage relevant Leader/s (if not already aware) to commence any necessary management actions.

For cases where fraud or criminal activity has been proven, the disclosure will need to be reported to the relevant Law enforcement authority by staff with authority to do so.

Support for those involved

WP.17 Support and guidance (both external to Suncorp and internal) may be sought prior to making a report or afterwards, depending upon the Discloser's needs. Suncorp's Whistleblower Service (Deloitte), Employee Assistance program (a Suncorp-funded confidential external counselling service available to Employees), Whistleblower Protection Officer and Employee Council are all available to provide support to the Discloser.

11. Records Management and Internal Reports

WP.18 Once finalised, all relevant materials must be filed by the relevant area accountable for the investigation on a secure platform for seven (7) years. This will include a copy of the investigation report and any associated documents. Access to these files by internal or external parties after the investigation has ceased is at the discretion of the Whistleblower Protection Officer.

WP.19 Any specific issue or insight from a disclosure that can be shared without compromising protections will be provided to the Whistleblower Executive Champion, the Board and any other relevant audience as agreed between the Whistleblower Protection Officer and the Whistleblower Executive Champion.

12. Key Terms

Public Interest Disclosure	<p>A Public Interest Disclosure, that is the disclosure of information to a journalist or a parliamentarian, where:</p> <ol style="list-style-type: none">i. the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation (the 'previous disclosure');ii. at least 90 days have passed since the discloser made the previous disclosure;iii. the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their previous disclosure;iv. the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest;v. before making the Public Interest Disclosure, the discloser has given written notice to the body to which the previous disclosure was made that:<ul style="list-style-type: none">• includes sufficient information to identify the previous disclosure; and• states that the discloser intends to make a Public Interest Disclosure.vi. the extent of the information disclosed in the Public Interest Disclosure is no greater than is necessary to inform the recipient of the misconduct or improper state of affairs.
Emergency Disclosure	<p>An Emergency Disclosure, that is the disclosure of information to a journalist or parliamentarian, where:</p> <ol style="list-style-type: none">i. the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation (the 'previous disclosure');ii. 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;iii. before making the emergency disclosure, the discloser has given written notice to the body to which the previous disclosure was made that:<ul style="list-style-type: none">• includes sufficient information to identify the previous disclosure; and• states that the discloser intends to make an emergency disclosure.iv. the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the recipient of the substantial and imminent danger.