

## 1. Purpose and Scope

Suncorp is committed to fostering a culture of honest and ethical behaviour. We recognise 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.

We understand that sometimes making a disclosure of wrongdoing can be difficult due to the nature of the disclosure or the fear of reprisal. This Policy describes the protections and support that will be provided to People who make disclosures.

This Policy explains:

- the process for making a disclosure of Reportable Conduct;
- the protections and protocols in place to support People who raise Reportable Conduct; and
- how Suncorp investigates Reportable Conduct disclosures.

### 1.1 Who does this Policy apply to?

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.

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

## 2. How to report a concern

If you have a concern you wish to report, we encourage you in the first instance to raise the matter with your Leader or Leader Once Removed. Allegations of internal fraud and bribery and corruption should be disclosed directly to Group Internal Fraud<sup>1</sup>.

Any concern related to employment, or former employment, which could have implications for you, but no significant implications for Suncorp or related entities is considered a Personal Work-Related Grievance. If you wish to report a Personal Work-Related Grievance you should refer to the [Complaints and Investigations Guideline](#) or seek advice from the Employee Council.

Examples of a Personal Work-Related Grievance, impacting you directly may include:

- interpersonal conflict;
- complaint about a performance or reward review outcome;
- grievance about a recruitment decision including engagement, transfer or promotion;
- complaint about any disciplinary action taken or proposed to be taken against you;
- decision regarding terms and conditions of employment; or
- other matters that do not breach workplace laws.

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<sup>1</sup> Australia: 1800 182 422. New Zealand: 0800 451 773

Making a report using Suncorp's Whistleblower Service about a Personal Work-Related Grievance is not a Protected Disclosure under the Law, unless:

- the report includes or is accompanied by information about Reportable Conduct (refer to Section 3 of this Policy);
- 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 your personal circumstances;
- You have suffered from or are threatened with Detrimental Conduct or Retaliatory Action in connection with the making of a disclosure; or
- you make a disclosure to a legal practitioner for the purpose of seeking legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

### 3. What is Reportable Conduct and Why Make a Disclosure under this Policy?

Whistleblower protections exist to provide better protections to individuals who disclose wrongdoing and encourage greater transparency in how disclosures of wrongdoing are dealt with. At Suncorp, to disclose wrongdoing under this Policy is to disclose Reportable Conduct - an activity, conduct or state of affairs that you have reasonable grounds to suspect has occurred, is currently occurring or is likely to occur with regard to Suncorp or its related bodies corporate and could be considered to be:

- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, criminal damage against property, fraud, money laundering or misappropriation of funds, and offering or accepting a bribe;
- financial irregularities;
- deliberate failure to comply with or, where required to do so by law, disclose a breach of legal or regulatory requirements;
- engaging in or threatening to engage in Detrimental Conduct or Retaliatory Action against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure;
- an activity that could or will lead to a breach of work health and safety laws, environmental or health risks, or 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 definition of Reportable Conduct, conduct that constitutes "Serious Wrongdoing" under the Protected Disclosures Act 2000, including:
  - a) an unlawful, corrupt, or irregular use of funds or resources of a public sector organisation; or
  - b) an act, omission, or course of conduct that constitutes a serious risk to public health or public safety or the environment; or
  - c) an act, omission, or course of conduct that constitutes a serious risk to the maintenance of law, including the prevention, investigation, and detection of offences and the right to a fair trial; or
  - d) an act, omission, or course of conduct that constitutes an offence; or
  - e) an act, omission, or course of conduct by a public official that is oppressive, improperly discriminatory, or grossly negligent, or that constitutes gross mismanagement, whether the wrongdoing occurs before or after the commencement of the Protected Disclosures Act.

Where you make a disclosure about Reportable Conduct which is not considered to be a Protected Disclosure under the Law, you will qualify for the protections set out in this Policy but not those applicable under the Law.

You are not required to prove the allegation, and protections can still apply should your disclosure turn out to be incorrect. However, you must not deliberately make a false report i.e., a report that you know to be untrue.

### 3.1 How to disclose Reportable Conduct for the purpose of receiving protection

Making a disclosure of Reportable Conduct should be made to a Suncorp eligible recipient (a list of eligible recipients is provided below) who are aware of how to proceed when they receive such a disclosure:

- Suncorp Whistleblower Service (Deloitte) (an independent and confidential channel);
- Whistleblower Protection Officer (Head of Risk & Compliance Operations);
- Member of the Executive Leadership Team (ELT);
- Head of Tax (for tax related matters);
- Executive General Manager Internal Audit;
- Suncorp Appointed Actuary;
- Manager Group Internal Fraud;
- Head of Office of the Superannuation Trustee (Australia) if the matter relates to superannuation.

These eligible recipients are in the best position to receive your reports and you are encouraged to make disclosures to these internal contacts in the first instance. However, Reportable Conduct can also be disclosed via the following avenues:

- Directly to a director of the Board or if the matter relates to superannuation, a director of the Board of Suncorp Portfolio Services Limited;
- Directly to the applicable External Auditor of Suncorp;
- Directly to the regulator and in the case of [Reportable Conduct](#) in New Zealand, to the Appropriate Authority (provided the requirements in the Protected Disclosures Act are met).
- In Australia, an [Emergency Disclosure or Public Interest Disclosure](#) can be made to a parliamentarian or journalist, however, it is recommended that independent legal advice is obtained prior to making this type of disclosure. A disclosure must have previously been made to ASIC, APRA or a prescribed body and written notice provided to the body to which the disclosure was made and, in the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure.

A disclosure can also be made directly to an external Legal practitioner for the purpose of obtaining legal advice or legal representation about the operation of the whistleblower laws.

The Suncorp Whistleblower Service (Deloitte) contact details are below.

<b>Phone</b>	Australia: 1800 444 774 New Zealand: 0800 202 643 Outside of Australia or New Zealand: +61 3 9667 3727 (International call rates apply)
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<b>Mail</b>	Australia: Reply Paid 12628 A'Beckett Street, Melbourne, VIC 8006 New Zealand: PO BOX 912028 Victoria Street West, Auckland 1142 New Zealand
<b>Web</b>	<a href="http://www.suncorp.deloittedigital.com">www.suncorp.deloittedigital.com</a>
<b>Email</b>	suncorp@deloittedigital.com
<b>Fax</b>	613 9691 8182

The contact details for the Whistleblower Protection Officer is +617 3734 8044. The other eligible recipients identified above can be contacted by email or telephone

## 4. What information should be provided when making a disclosure?

Providing as much information as possible when making a disclosure will allow any necessary 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 one-off incident or is ongoing; and
- 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 you have raised the issue within line management and if so, the management response;
- If the issue has been raised with any other person;
- Your name, Function/Area/Team and contact number (should you not want to remain anonymous); and
- Any other information which is considered relevant.

## 5. Maintaining Confidentiality, Protection and Support

### 5.1 Approach to maintaining confidentiality

You may make a disclosure anonymously or use a pseudonym and still be eligible for protection under this Policy and the Law. You can determine to what degree you wish to remain anonymous based on the consent given to the recipient of your disclosure. If you make a disclosure via email and your identity can't be determined it will be treated as an anonymous disclosure.

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

- redacting personal information if received;
- redacting information that would lead to identification;
- using secure channels of communication during the investigation;
- limiting access to disclosures;
- providing training or awareness to those involved in an investigation to ensure they understand their obligations in relation to maintaining confidentiality; and

- destroying records related to investigations after 7 years (unless otherwise required).

At any time during the investigation you may acknowledge and consent to your name and contact details being disclosed. You may also refuse to answer questions if you feel doing so could reveal your identity. Information pertaining to the disclosure may be shared by us 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);
- as part of customary reporting to the Board; or
- obtaining independent financial, legal and/or operational advice as required.

Your identity will not be made known beyond the scope of consent obtained by us unless it is:

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

The Whistleblower Protection Officer and the Whistleblower Executive Champion, in consultation with People & Culture, will have discretion to decide whether specific individuals not directly involved in the investigation should be made aware that a whistleblower disclosure has been made.

## 5.2 Making a complaint when your confidentiality has been breached

If you believe your confidentiality has been breached, you may escalate internally to the Whistleblower Protection Officer or the Whistleblower Executive Champion or raise a complaint to a regulator such as ASIC, APRA or the ATO.

## 5.3 What protections are available

Where an allegation of [Reportable Conduct](#) is raised, Suncorp will take all reasonable steps to ensure you (and those responsible for the associated investigation and support) will not be personally or financially disadvantaged by reason of having made the disclosure. This protection covers any threatened or actual behaviour that constitutes [Detrimental Conduct](#) in Australia or [Retaliatory Action](#) in New Zealand.

If you or someone responsible for the investigation and support, believes they are, or may be, subject to Detrimental Conduct or Retaliatory Action this information should be provided to the Whistleblower Protection Officer or through the Suncorp Whistleblower Service (Deloitte). Should the response be unsatisfactory, escalation may be made to the Whistleblower Executive Champion. You may also seek independent legal advice or contact the applicable regulator.

If the disclosure qualifies as a Protected Disclosure you may be entitled to protection from civil, criminal, or administrative liability (in Australia, under the Corporations Act 2001 or Taxation Administration Act 1953) or civil, criminal or disciplinary proceedings (in New Zealand, under the Protected Disclosures Act 2000).

While some guidance can be provided by Suncorp's Whistleblower Service (Deloitte) and the Whistleblower Protection Officer, you should seek independent legal advice prior to making a disclosure where any doubt exists as to whether the Reportable Conduct may be considered a Protected Disclosure and qualify for additional protections under the Law. In New Zealand you may also contact an Ombudsman for information and guidance if you have disclosed or are considering disclosing information under the Protected Disclosures Act 2000.

## 5.4 When protections are not available

You may not be protected if you:

- knowingly give false or incorrect information and/or make vexatious claims; or
- 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 your role in that wrongdoing (although in some cases the making of a report may be a mitigating factor).

## 5.5 Support available

Support and guidance (both external to Suncorp and internal) may be sought prior to making a report or afterwards, depending upon your 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 Employees.

If you are not a Suncorp employee, we will endeavour to support you and take all reasonable steps to ensure your confidentiality is maintained in accordance with your consent, however, there will be limitations on the type of support we will be able to provide. For example, we may not be able to:

- protect the employment of a Person who is not a Suncorp employee;
- manage the behaviour of others who are not Suncorp employees; and
- manage other situations where it may be impossible for Suncorp to provide protections.

## 5.6 Compensation and Legal Advice

In Australia compensation and other remedies can be sought through the Courts should:

- loss, damage or injury be suffered due to making the disclosure; and
- Suncorp failed to take reasonable precautions and exercise due diligence to prevent the Detrimental Conduct.

Should Detrimental Conduct occur a Court may make any of the following orders:

- an order requiring the payment of compensation for loss, damage or injury suffered as a result of the Detrimental Conduct;
- an order granting an injunction to prevent, stop or remedy the effects of the Detrimental Conduct;
- an order requiring a person to apologise for engaging in the Detrimental Conduct;
- 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;
- an order requiring the payment of exemplary damages; or
- any other order the Court thinks appropriate.

In New Zealand where a current or former employee of Suncorp claims to have suffered Retaliatory Action from making a Protected Disclosure, they may have a personal grievance for the purposes of the Employment Relations Act 2000.

In either jurisdiction, seeking independent legal advice is encouraged should compensation or other remedies be sought.

## 6. Investigations

### 6.1 Receiving a report

When you make a disclosure, the Whistleblower Protection Officer has seven (7) calendar days from the lodgement date to provide acknowledgement of the disclosure. During this time the Whistleblower Protection Officer will:

- Make an assessment as to whether the allegation constitutes Reportable Conduct;
- seek further information to better understand the issue and determine whether an in-depth investigation is necessary; and
- assess whether, based on the information provided, you or anyone else mentioned in the disclosure is at risk of Detrimental Conduct or Retaliatory Action.

In undertaking this assessment, information may be shared about the disclosure to specialist internal teams (including but not limited to People & Culture, Legal Advisory and Internal Fraud).

Where an assessment is made that a disclosure does not constitute Reportable Conduct, the Whistleblower Protection Officer will take steps to ensure you are notified and other mechanisms available to report the issue.

Where the disclosure is deemed to constitute a Personal Work-Related Grievance, the disclosure will be referred to the People & Culture team for actioning in accordance with their internal processes. Unless you provide your consent, you will remain anonymous and confidentiality provisions will apply.

Suncorp will take reasonable steps to ensure you are kept informed in relation to timeframes and next steps and are advised when the matter is closed. Once an investigation commences, the Whistleblower Protection Officer will endeavour to inform you on the progress of the investigation within twenty-eight (28) days from lodgement date or earlier where possible. You will be provided with regular updates if you are able to be contacted (including through anonymous channels) but the regularity of the updates will vary depending on the nature of the disclosure.

### 6.2 Selecting a Whistleblower Investigation Officer

Where an investigation is required, Suncorp will appoint a Whistleblower Investigation Officer who will conduct an objective, fair, and evidence-based investigation process. 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.

Individuals with a specialist skill set from another part of the business that is independent of the Business area involved may be asked to participate in the investigation.

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.

Based on the nature of, and information provided within, the disclosure, a decision may be made to inform the Leader or Leader Once Removed of the individual/s against whom the allegation of Reportable Conduct has been made.

### 6.3 Conducting an Investigation

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. 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 your anonymity unless consent has otherwise been given; 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.

At any point during the investigation you 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.

#### **6.4 What happens if you are the subject of a Whistleblower matter?**

The person against whom an allegation has been made will generally not be made aware that a complaint has been made against them, such as 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.

During the investigation, for the person who is the subject of a Whistleblower disclosure, we will ensure that:

- a fair and impartial investigation is conducted;
- they are presumed innocent by law;
- their identity will be protected where possible and reasonable, subject to the requirements of this Policy and the law;
- where an allegation proceeds past the initial investigation stage, subject to confidentiality considerations, they will be:
  - informed of the allegations; and
  - given an opportunity to respond to the allegations;
- where they are aware of the investigation, they will be formally advised as to the outcome of the investigation; and
- after the investigation, where the allegations contained in the disclosure are determined to be unsubstantiated, they are entitled to continue in their role as if no allegation was made. In some circumstances, this may involve a statement of exoneration. Where appropriate, they will be contacted for the purposes of a welfare check.

#### **6.5 Investigation findings**

The method for documenting and reporting the findings of an investigation will depend on the nature of the matters being investigated and the requirements of the law. Investigation findings will normally be documented and reported to the Whistleblower Protection Officer but this will be a confidential report which will not normally be provided to you.

As the discloser, you will (subject to the requirements of the law) be informed of the outcome of the investigation that will at a minimum indicate whether the disclosure has been substantiated, partially substantiated, or unsubstantiated. Other information may be provided to you 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, the Whistleblower Protection Officer and/or People & Culture will engage relevant Leader/s (if not already aware) to commence any necessary management actions. The relevant Leaders will be required to provide monthly updates to the Whistleblower Protection Officer and/or People & Culture on the status of the 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.

## 7. Roles and Responsibilities

### **Whistleblower Executive Champion**

The Whistleblower Executive Champion is usually the Chief Risk Officer (or delegate) and is responsible for:

- responding to escalations and acting as an executive sponsor; and
- monitoring the overall effectiveness of the Whistleblower Policy. In doing so they 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.

### **Whistleblower Protection Officer**

The Whistleblower Protection Officer is responsible for:

- reviewing this Policy to ensure compliance with Australian and New Zealand regulatory requirements;
- providing assistance to you (before or after a report is made) in relation to the process;
- considering whether the conduct raised amounts to Reportable Conduct and where it clearly does not, informing you of any other steps outside of the Whistleblower process that can be taken to address the allegations;
- enabling the investigation of Reportable Conduct;
- maintaining your confidentiality, privacy, and anonymity (as required);
- reporting back to you with investigation updates and the outcome of the investigation;
- promoting awareness of this Policy and the raising of Reportable Conduct by integrating the information into Employee training and induction programs; and
- reporting on trends and provide a summary of all disclosures to the Board while maintaining your confidentiality and anonymity as required.

The Whistleblower Executive Champion and Whistleblower Protection Officer have direct and unrestricted access to independent financial, legal and operational advisers as required.

### **Whistleblower Investigation Officer**

Following appointment, the Whistleblower Investigation Officer is responsible for conducting an evidence-based investigation process consistent with the requirements outlined in this Policy.

## 8. Governance

### **8.1 Awareness and Training**

Suncorp will include its Whistleblower Policy on its website and make it available to Suncorp's Officers and Employees on the Suncorp intranet.

Suncorp will build awareness amongst Employees, Officers and applicable External Workers<sup>2</sup> including what constitutes Reportable Conduct and how to raise it via a bi-annual communication and annual mandatory training module, and for eligible recipients, guidance on how to respond if they receive a disclosure. Specialist training will be provided to other

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<sup>2</sup> As per the [External Workforce Allocation Guidelines](#).

roles noted that are responsible for implementing this Policy.

## 8.2 Records Management and Internal Reports

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. Findings will be utilised to continuously improve processes, procedures, and culture.

Suncorp has 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.

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

**Board** The Board of Directors of Suncorp Group Limited, another Main Board Entity or a NZ entity.

**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.

**Emergency Disclosure** The disclosure of information to a journalist or parliamentarian, where:

- 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:
  - 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.

**Law** The Corporations Act 2001 (Cth), Protected Disclosures Act 2000 (New Zealand) or

Taxation Administration Act 1953 (Cth), as applicable in the circumstances.

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 or the Superannuation entity;
- For the Superannuation entity, a Trustee, Custodian, Investment Manager, Officer of a body corporate that is a trustee, custodian or investment manager; and
- relatives of someone referred to above, or a dependent of someone referred to above or that Person's spouse.

Protected Disclosure

A Person's disclosure that gives rise to protections under the Law rather than this Policy. For a disclosure to qualify as a Protected Disclosure, the Person making the disclosure must:

- In Australia:
  - make the disclosure in accordance with the provisions of the Corporations Act or the Taxation Administration Act 1953 (Cth) in the case of a tax disclosure (ie through the channels identified in section 3.2 of this Policy including to ASIC or APRA or a registered tax or BAS agent of Suncorp in the case of a tax disclosure);
  - have reasonable grounds to suspect that the relevant information:
    - indicates that a company, a related bodies 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 (whether or not it involves a contravention of a particular law);
    - concerns misconduct or an improper state of affairs or circumstances in relation to a company or its related bodies corporate; or
    - concerns misconduct or an improper state of affairs in relation to the tax affairs of a company or its related bodies corporate.
- In New Zealand:
  - ensure 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;
  - ensure the information being disclosed is not protected by legal professional privilege; and
  - the Employee wishes the disclosure to be protected.

Public Interest Disclosure

The disclosure of information to a journalist or a parliamentarian, where:

- 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:
  - 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.

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.

