Human Rights
Position Statement and
2020 Action Plan
1. Purpose

At the Westpac Group, we respect and advance human rights.

Respecting and advancing human rights helps us to achieve our vision to help our customers, communities and people to prosper and grow and reflects the belief that all people are entitled to basic rights and freedoms no matter where they are from, their religion, gender, race or any other status.2

Supporting and aligned with our Principles for Doing Business, this statement outlines our commitments and approach, in line with our degree of influence as an employer, financial services provider, buyer and proud supporter of our communities.

1 In this statement a reference to ‘Westpac’, ‘Group’, ‘Westpac Group’, ‘we’ and ‘our’ is to Westpac Banking Corporation ABN 33 007 457 141. The statement applies globally, incorporating all Westpac Group brands (including Westpac, St.George, BankSA, Bank of Melbourne and RAMS, Westpac Institutional Bank, BT Financial Group, and Hastings Funds Management) and locations across Australia, New Zealand, the Pacific, Asia, the United Kingdom and the United States.

2 Universal Declaration of Human Rights.
2.

Our commitments

We are a signatory of the United Nations Global Compact and support the UN ‘Protect, Respect, Remedy’ framework. Our implementation of the framework is guided by the UN Guiding Principles on Business and Human Rights.

We are committed to respecting and supporting:

- Universal Declaration on Human Rights.
- The International Covenant on Civil and Political Rights.
- The International Covenant on Economic, Social and Cultural Rights.
- ILO Declaration on Fundamental Principles and Rights at Work.
- OECD Guidelines for Multinational Enterprises.
- ILO Tripartite Declaration Concerning Multinational Corporations and Social Policy.
- United Nations Global Compact.
- Equator Principles.
- Principles for Responsible Investment.
- Any other applicable local laws.
Supporting gender equality:
Celebrating International Women's Day 2016 with employees, customers, industry and community leaders.
3.

Our principles

Our human rights principles support and align to our Principles for Doing Business.

- We respect human rights as set out in the International Bill of Human Rights.3
- We abide by the human rights related laws of the countries where we operate and our own relevant policies.
- We believe that advancing human rights with the aim of leaving no one behind is fundamental to achieving sustainable development in line with the 2030 Agenda.
- We consider human rights impacts and opportunities within our value chain, including in relation to our employees, customers, suppliers and the broader communities where we operate.
- We focus our responses and activities on the rights within our value chain where we have a responsibility and where we can have the greatest influence.
- We work proactively to support vulnerable groups in our region, helping to reach those furthest behind first.
- We engage with stakeholders to enhance our approach and provide grievance mechanisms through which stakeholders can raise human rights concerns.
- We measure and communicate our human rights progress.

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3 The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights and its two Optional Protocols.
4.

Our focus

While our principles and approach is inclusive of and responsive to all internationally recognised rights, we concentrate our efforts towards our salient human rights, being those that stand out as being most at risk through our value chain.

To address our salient human rights, we focus our due diligence processes on:

- Economic and employment participation.
- Fair wages and working conditions.
- Freedom of association.
- Anti-discrimination, harassment and bullying.
- Workplace diversity, accessibility and flexibility.
- Accessible services and technology.
- Health, safety, security and wellbeing, in the workplace, community and online.
- Privacy and the collection, use and disclosure of personal information.
- Financial, educational, workplace, social and Indigenous inclusion.
- Community rights including:
  - The principle of free, prior and informed consent for Indigenous communities impacted by decisions or actions that affect their land, territory and natural resource.
  - Access to healthy environments, food security, access to water and sanitation.

Aligned with our position statements and other public commitments, we have a zero tolerance focus on:

- Unlawful discrimination against customers, our people or other groups with whom we have dealings.
- All forms of forced, trafficked and compulsory labour and child labour.
- Illegal land acquisition/land grabbing.

Our regular materiality assessments allow us to identify the current and emerging rights that are strategically relevant to us and our stakeholders and where we can make a meaningful positive impact.

We also seek to recognise the human rights interdependencies that exist within and among our various strategies, frameworks and action plans in order to enhance our approaches.

4 Unless otherwise stated all definitions are as set out in the Universal Declaration of Human Rights or by the United Nations Human Rights Office of the High Commissioner.
5 ‘Due diligence processes’ in this statement refers to our ongoing processes to identify, assess, integrate and act upon, track and report on salient human rights.
6 We aim to ensure that we do not discriminate on the basis of sex, age, marital status, family responsibilities or pregnancy, religion, political conviction, irrelevant criminal record, sexuality, sexual orientation, transgender, carers’ responsibilities, race, colour, national, social or ethnic origin, trade union status, disability or physical appearance.
7 Based on the International Labour Organisation’s definition of child labour as ‘work that deprives children of their childhood, their potential and their dignity. It is work that is mentally or physically dangerous and harmful to children, and interferes with schooling.’
8 Based on the International Land Coalition (2011) Tirana Declaration: Securing Land Access for the Poor in Times of Intensified Natural Resources Competition, land grabbing is defined as ‘large-scale land acquisition or concession which does one or more of the following: violates human rights, particularly those of women; flouts the principle of free, prior, and informed consent; takes place without or disregards a thorough assessment of social, economic, and environmental impacts; avoids transparent contracts with clear and binding commitments on employment and benefit sharing; or eschews democratic planning, independent oversight, and meaningful participation.’
5.

Our approach

International and human rights representative bodies, national governments and regulators seek to protect the breadth of human rights through various means.

Accordingly, we develop and implement a range of strategic, compliance and risk-based mechanisms to respect and advance human rights across our organisation and in relation to our business activities.

Our principles are embedded in the policies, statements, frameworks and action plans that support our day to day operations. These documents also provide for our ongoing due diligence processes that apply throughout our value chain.9

This statement summarises these processes and how we respect and advance human rights in relation to:

- **Employing our people**
- **Serving our customers**
- **Buying goods and services**
- **Providing financial services**
- **Supporting our communities**
- **Acting responsibly on financial crime**
- **Monitoring our human rights performance and ensuring effective governance**

“This statement summarises these processes and how we respect and advance human rights in relation to:”

Westpac seeks to develop relationships with stakeholders that respect and advance human rights, including suppliers, business and community partners that:

- Are committed to transparency in their governance structure and activities.
- Engage constructively with stakeholders to address concerns.
- Responsibly manage sustainability risks and opportunities associated more broadly with their activities.

9 Refer Table 1 for a list of related policies, statements, frameworks, and action plans that align our due diligence processes to the expectations of our stakeholders.
5. Our approach

5.1 Respecting rights through our risk management frameworks

Our Board-approved Risk Management Strategy and risk-class frameworks play a role in determining how we respect human rights. For example, we respect human rights that are embedded in local laws through our Compliance Management Framework, which requires that we:

- Comply with our legal obligations, regulatory requirements, voluntary codes of practice to which we subscribe, and Group policies, including the Westpac Code of Conduct.
- Establish frameworks, policies and processes designed to manage, monitor and report compliance and to minimise the potential for breaches, fines or penalties, or loss of regulatory accreditations.
- Take appropriate remedial action to address instances of non-compliance.

Beyond compliance with local laws, we manage human rights risk, being the risk of reputational or financial loss due to failure to recognise or address material existing or emerging human rights issues, as a type of sustainability risk under our Sustainability Risk Management Framework.

The management of human rights risks is particularly relevant to key areas of operation such as:

- Lending and investment decisions.
- Supply chain management.
- Operations.
- Employees.

In addition, there are escalation processes embedded in our risk management frameworks which will operate to escalate human rights incidents or issues.

5.2 Advancing rights through our strategies and action plans

A number of Group-level strategies contribute to how we respect and advance our salient human rights. These include:

- Group strategic priorities of Performance Discipline, Service Leadership, Digital Transformation, Targeted Growth and Workforce Revolution.
- Group Sustainability strategy and supporting divisional and regional sustainability strategies.
- Social Impact Framework which focuses us on the priorities of:
  - Advancing the nation through social change.
  - Helping out in times of need.
  - Enabling more inclusive banking and building financial capability.
  - Investing in economic wellbeing and greater prosperity.
- National Action Plans including the Australian Accessibility, Financial Inclusion, and Reconciliation plans.
Supporting economic empowerment: Bringing banking to women in unbanked regions across Papua New Guinea.
Our approach and responses by role

6.1 Our role as an employer

6.1.1 Respecting and advancing the human rights of our employees

We have policies in place to embed respect for the rights of all our employees, including those employed via agencies. Implementation of our policies is supported by employee awareness programs, training programs, and the establishment of targets.

Our commitment to respecting and advancing the rights of our employees is central in our people promise to foster a flexible, safe, and enjoyable environment where inclusion and diversity of thought are valued so that all our people can be their best.

For our employees this means that we respect and advance their individual rights through practical commitments to:

• Promote equal opportunity and not tolerate any form of unlawful discrimination in our workplace through every aspect of our employment relationship.

• Respect the right of our people to freedom of association, and recognise the right of our people to bargain collectively, within the laws of the country in which we are operating. We therefore aim to ensure that industrial association membership remains a matter of personal choice and Westpac does not discriminate between our people based on their membership or lack of membership of an industrial association.

• Ensure the right of our workers to dignified working conditions, providing a safe and healthy environment, free from work-related injuries and illnesses.

• Encourage everyone to speak up early about actual or suspected misconduct or unlawful activity (including suspected fraud, corruption or significant health and safety concerns).

• Support our employee’s wellbeing through a ‘whole of life’ approach balancing the wellbeing factors of family and community, finances, health, values and work.

• Create an environment where our people (as well as our customers and community) feel safe and comfortable disclosing their individual accessibility requirements to us, confident we will respect those requirements and cater for them wherever we can.

• Focus on meaningful careers for Indigenous Australians, Maori and Pasifika in New Zealand, and local employment opportunities in Westpac Pacific and our operations in Asia.

• Create a diverse, inclusive and flexible workplace that enables all of our people to fully contribute, and reflects and serves the communities where we operate.

To support and encourage Westpac’s diverse and inclusive workplace, we have in place Employee Action Groups. The groups create opportunities for our people to have a say and play a part in advocating for inclusion and diversity, foster member development and promote awareness of group interests at corporate, community and individual levels. Each Employee Action Group is governed by a committee that is sponsored and supported by a member of the local Executive Team with outcomes reported quarterly through to the Westpac Group Inclusion & Diversity Council, which is chaired by the CEO.


Go back to Our approach.

See our Principles for Doing Business: Employees for more information.
6.2
Our role as a customer service provider

6.2.1 Respecting and advancing human rights through our customer service promise

We are passionate about helping people to achieve their financial goals, playing a contributing role in the realisation of the rights to which we are all entitled. This comes with a responsibility to deal with people fairly and honestly.

Our Code of Conduct requires us to ‘Do the Right Thing by our Customers’, and we work together to deliver superior service for our customers, communities and people while meeting our regulatory obligations and our own internal policies.

For our customers this means that we respect and advance their individual rights through practical commitments to:

- Deliver all our customers a great service experience.
- Market our products and services using clear information and provided at the right time to help our customers make decisions.
- Provide products and services that are suitable and fair, and meet our customers’ needs and financial capacity.
- Design and deliver products that do what we’ve promised they do.
- Charge our customers fairly for our products and services.
- Keep our customers up to date on their rights and our obligations to make informed decisions, even when things change.
- Make it convenient and reasonably accessible to bank with us.
- Help our customers to be financially confident, improving their financial competency.
- Treat our customers’ personal information in accordance with our privacy policies.
- Support our customers if they get into financial difficulty.
- Fix things when they go wrong.
- Make available the means to raise concerns directly or independently.

Go back to Our approach.

See our Principles for Doing Business: Code of Conduct & Customers for more information.
Our approach and responses by role

6.3
Our role as a buyer

6.3.1 Setting out expectations for our suppliers

Our Responsible Sourcing Code of Conduct establishes the expected standards of ethical, social and environmental business practices, including human rights, required of suppliers. We encourage our suppliers to ensure they adopt similar principles with their own key suppliers.

The Responsible Sourcing Code of Conduct is implemented through screenings, supplier assessments and scorecards; supplier engagement, risk management and mitigation; and the use of contractual clauses. Contractual clauses also ensure we have the right to undertake performance reviews of higher risk suppliers using independent external third parties.

We seek to ensure that suppliers have the management systems, policies and processes in place and performance levels that demonstrate that risks identified, including those relating to human rights, are being effectively managed and mitigated. Where gaps are identified in performance levels we seek to work with suppliers to ensure improvements are implemented.

We also seek to engage and collaborate with suppliers which demonstrate a commitment to best practice, performance, leadership and innovation in sustainability.

6.3.2 Providing opportunities for suppliers supporting human rights

We look for opportunities to support organisations that proactively support human rights. This includes exploring opportunities for social procurement, such as supporting procurement from social enterprises and increasing supplier diversity, with specific targets for Indigenous businesses within our supply chain in Australia.

“We look for opportunities to support organisations that proactively support human rights.”

Go back to Our approach.

See our Principles for Doing Business: Supply Chain Management for more information.
Our approach and responses by role

6.4 Our role as a financial services provider

6.4.1 Considering human rights in our financing activities

Our assessment of sustainability risk for our financing activities includes an assessment of human rights risks.

For financing activities of our business customers, the requirements for assessing sustainability risks, including human rights, requires the identification of potential Environmental, Social and Governance risks and may require additional analysis throughout the credit assessment and approval process, including credit evaluation at a country, sector, customer and transactional level.

According to the materiality of Environmental, Social and Governance risk exposures, our credit evaluation approach includes an assessment of customers’:

• Approach towards managing human rights risks and capability to implement relevant policies and procedures.
• Commitments to operate in accordance with relevant global, regional and national laws and regulations governing sustainability performance dimensions (including international frameworks we commit to in this statement).
• Own due diligence of human rights in their value chains and monitoring of their own human rights performance.

Where material potential risks are identified we may engage external experts. For instance, for the financing of major projects under the Equator Principles, customers are required to undertake an independent social impact analysis and engage with local and other potentially impacted stakeholders. Funding will only be provided when we are confident that these risks have been effectively mitigated.

We undertake regular customer monitoring and where material concerns are identified, either through our own analysis or raised by stakeholders, we will engage with them individually to resolve the issue. Where we are unable to reach a resolution we may look to exit our relationship with the customer.

6.4.2 Considering human rights in our investment activities

As signatories to the Principles for Responsible Investment (PRI), BT Financial Group and Hastings Funds Management incorporate ESG considerations into investment analysis and decision making. This includes engagement with companies and funds in which we invest as well as analysis of ESG factors, including human rights.

BT Financial Group’s approach to responsible investment is governed by four key principles:

1. consideration of ESG factors in the investments process can help drive positive financial outcomes.
2. we make solutions available to our customers to empower them to manage their own environmental and social impacts.
3. as institutional investors and custodians of our customers’ money, we have a responsibility to be active owners.
4. transparency counts.

Go back to Our approach.

See our Principles for Doing Business: Customers for more information.

11 For further detail, see Westpac’s Approach to Sustainable Finance.
13 See BT Financial Group’s Responsible Investment Position Statement for more information.
6.5 Our role as a supporter of communities

6.5.1 Support and advancement of human rights in our communities

We contribute to the economic and social development of the regions where we operate in a range of ways. To create sustainable impact, we collaborate with community partners and organisations to build capacity and leverage our expertise to advance the 17 United Nations’ Sustainable Development Goals. We seek to drive social impact through:

- Matching employees’ charitable donations.
- Strategic partnerships, working collaboratively with community and government organisations.
- Harnessing the expertise of our employees and sharing their skills to support community organisations.
- Grants, scholarships and capability building.
- Leveraging our supply chain.
- Sustainable and impact investment solutions.
- Disaster relief for customers.
- Lending and banking solutions for vulnerable customers.

We are committed to play a leadership role and work with other companies, investors, community stakeholders and governments towards achievement of these global goals.

6.5.2 Reaching those furthest behind

Our commitment to the global Sustainable Development Goals of the 2030 Agenda means that we support its pledge that no one will be left behind.

We work with community partners who support some of the most vulnerable members of our communities and our charitable Foundations provide grants and organisational mentoring to organisations and community leaders that work to improve human rights for people experiencing social or financial disadvantage. Complementing this work are our own initiatives that seek to provide support for vulnerable individuals at risk of exclusion from economic and employment participation and customers who have been victims of human rights abuses including instances of family violence.

We work to make finance inclusive by helping to increase money management skills and financial competency for all. Embedded in our core business, we actively introduce initiatives to support the financial wellbeing of ageing and culturally diverse customers. We actively develop and introduce products to support specific customer groups, for instance:

- Supporting the provision of microfinance to Indigenous and disadvantaged Australian businesses and refugees in Australia.
- Banking segments of the population that remain unbanked or underserved, particularly women and people from rural areas of Fiji and Papua New Guinea.

- Establishing lending targets for the social and affordable housing sector in Australia and New Zealand.
- Participation in new financial instruments, including the provision of social benefit and green bonds.

We also work to identify and assess the human rights interdependencies that can impact the most vulnerable. For example, the adverse impacts of climate change have a flow on effect to the enjoyment of a range of human rights by people throughout the world, including the rights to life, water and sanitation, food, health, housing, self-determination, culture and development.

Go back to Our approach.
6.5.3 Indigenous Peoples

Acknowledging the UN Declaration on the Rights of Indigenous Peoples, we apply its principles in advancing the rights of Indigenous Peoples within regions where we have a significant role in providing personal banking services. These include:

**Australia**

Our work with Indigenous communities in Australia is detailed in our Reconciliation Action Plan. Key priorities are around making banking more accessible and creating a better service experience for Indigenous Australians and building their economic success and independence.

Building more accessible banking services provides benefits for not just Indigenous Australians, but also people from different cultural backgrounds. We aim to attract, retain and support Indigenous Australian employees with the aim of building Indigenous Australian leaders within the organisation. We actively contribute to strengthening Indigenous-led community change through our commitment to cultural awareness and engagement, including our participating in the Jawun partnership, whereby our employees are seconded into Indigenous Australian organisations nationally.

**New Zealand**

Westpac New Zealand works closely with Iwi and Maori businesses and communities to support their financial aspirations through products, advice, financial education, bi-lingual signage and information and employment opportunities.

Westpac New Zealand also supports Maori and Pasifika families in business through social and whanau enterprise.

**Pacific**

In the Pacific, Westpac has a long and proud history supporting and advancing local people, communities and culture. We work closely with Government Ministries responsible for promoting and preserving Indigenous cultures in both Fiji and PNG, and hold a number of events and initiatives to celebrate and advance Indigenous culture and peoples.

As a workplace we look for opportunities to celebrate our shared Indigenous Australian heritage and recognise achievement.

“Building more accessible banking services provides benefits for not just Indigenous Australians, but also people from different cultural backgrounds.”

Go back to Our approach.

See our Principles for Doing Business: Environment & Community for more information.
6.6 Our role as a responsible business

We understand that our approach to governance and ethical practices plays a critical role in respecting the rule of law and the democratic processes that are essential for the ongoing protection and advancement of human rights.

We respect the role of governments and regulators to protect human rights, and engage in an open, honest and transparent manner. We work with governments and regulators to strengthen the regulatory environments where we operate as well as contributing to relevant government enquiries and industry consultations.

Accordingly, we recognise that it is important that we deal with governments and industry bodies appropriately, fairly pay our taxes, and meet global requirements to address financial crime.

6.6.1 Approach to government dealings and political donations

Westpac will not engage in political engagements where there is potential for the purpose of our engagement to be misrepresented or when the engagement compromises, or appears to compromise, the integrity of a public official or the Westpac Group. Any donations made by us are for the purpose of supporting the democratic process and we do not make cash donations to political parties.

6.6.2 Approach to industry codes of practice

We believe in being held accountable for our performance against any industry or voluntary codes of practice that we have endorsed. We view these codes as one way we can continually strengthen how we do the right thing by our customers. We are committed to complying with the relevant codes that we have endorsed and working with industry bodies to ensure that these codes remain relevant to the needs of our customers.

6.6.3 Approach to taxation

We are one of the largest taxpayers in Australia and New Zealand and we seek constructive, co-operative and transparent working relationships with the Australian Taxation Office, New Zealand Inland Revenue and other tax authorities. Paying the right amount of tax in all the jurisdictions where the Group operates is something we take seriously, and since our 2015 financial year, we have annually reported the Group’s tax contributions and how we approach our tax responsibilities.

6.6.4 Approach to financial crime

Financial crime can impact upon human rights where it finances, facilitates or supports activities such as slavery, human trafficking, child labour, forced or bonded labour, terrorism or unlawful businesses. We take a zero tolerance approach, through our commitment to preventing, detecting and deterring financial crime (including money laundering, terrorism financing, tax evasion, fraud, bribery and corruption and the violation of economic and trade sanctions).

Our approach is consistent with international standards and guidance, including the Financial Action Task Force and Basel Committee on Banking Supervision. It is detailed in the Westpac Group Financial Crime Risk Management framework which clearly outlines roles and responsibilities and governance structure in relation to financial crime. It is supported by specific policies for each identified area of financial crime risk as well as standards, risk models and guidance for employees.

We work in conjunction with the governments of the countries in which we operate to support their financial crime objectives. All identified breaches are reported to the appropriate authority in a timely manner and we have a zero tolerance for intentional compliance breaches by our employees.

Go back to Our approach.

See our Principles for Doing Business: Code of Conduct & Governance and ethical practice for more information.
Supporting access to employment, education, health and housing.

Toowoomba Clubhouse is a social enterprise with over 900 members who have experienced mental illness and struggle to find work. Westpac Group has supported them to establish Vanguard Laundry Services, through equipment finance, a Westpac Foundation grant and More Than Money non-financial support.
7.

Governance of our human rights framework

7.1 Scope and application

The principles and guidelines set out in this statement apply to all Westpac Group brands and subsidiaries operating globally. It also acts as a reference position for those stakeholders in our value chain, including employees, customers, joint-venture partners, suppliers, contractors and outsource providers, and the broader community.

We understand that governments, in executing their responsibility to protect human rights may interpret state, business and individual’s duties differently when implementing laws, regulations and codes. When compared to this statement and our policies, if those laws, regulations or codes are:

- **More stringent** - local requirements and expectations apply in addition to this statement.
- **In conflict** - local requirements and expectations will be met and we will seek to promote our principles as an example of respectful human rights practices, in line with our degree of influence.
- **Weaker** - our policies, statements, frameworks and action plans will apply in addition to local requirements and expectations, and we will seek to raise awareness of human rights, in line with our degree of influence.

7.2 Engaging with stakeholders

We proactively engage with stakeholders to deepen our understanding of their expectations. Our approach to stakeholder engagement is set out in our Stakeholder Engagement Framework and aligned to the AA1000 Stakeholder Engagement Standard. This informs how we identify and assess stakeholders or their legitimate representatives (including human rights defenders) with whom to engage, and also provided guidance on the triggers, method and frequency of engagement.

We continue to work with internal and external stakeholders to raise the awareness and understanding of human rights.
7. Governance of our human rights framework

7.3 Effective grievance mechanisms and access to remedy

Effective engagement with stakeholders includes having processes in place where all relevant stakeholders can express concerns related to our human rights performance. This includes having in place complaints mechanisms for customers, employees, suppliers and members of the public.

Employees, secondees, contractors and consultants can raise concerns through a range of channels, including anonymously in accordance with our Whistleblower Protection Policy. This policy contains protection and support mechanisms based on our zero tolerance for retaliation such as dismissal, harassment or discrimination toward anyone raising a concern.

All customer complaints are dealt with in line with the relevant Privacy Policy and Complaints Management Policy. They can be submitted anonymously via the Contact us – Feedback and complaints pages of our websites, or via regular contact channels by phone, post or in person. Each policy sets out the time-frames in which a response can be expected and the relevant resolution processes. Our Group Customer Experience team can be contacted via email CustomerExperienceWestpacGroup@westpac.com.au or by post to Customer Experience, Reply Paid 5265, Sydney NSW 2001.

Part of the Westpac ethos is that if we get things wrong, then we put things back on track. For example, Our Service Promise supports our focus on improving standards of service and putting the customers at the centre of what we do. This includes a model of empowerment for our people to make decisions deemed to be in the customers’ interests.

The Group also has an independent customer advocate who:
• is empowered to resolve issues for our customers.
• can overturn decisions made by our internal dispute resolution process.
• can effectively bind us to customer remedy without the need for CEO approval.

In Australia, our customers are also able to contact several industry bodies to raise any concerns, including the Financial Services Ombudsman and the Superannuation Complaints Tribunal. In other jurisdictions, we make customers aware of avenues for making disputes including regulators and industry bodies.

All members of the public are able to raise queries and comment on our approach to human rights with our Group Sustainability team via email sustainability@westpac.com.au or by post to 275 Kent Street, Sydney NSW 2000 Australia.

“Our Service Promise supports our focus on improving standards of service and putting the customers at the centre of what we do. This includes a model of empowerment for our people to make decisions deemed to be in the customers’ interests.”
7.4 Performance reporting and monitoring

Progress against the targets and objectives set out in this framework is monitored by the Group Sustainability Council, with performance of related policies, statements, frameworks and action plans being monitored by their respective governance committees. Progress is also publicly reported against globally accepted sustainability reporting frameworks in our Annual Review and Sustainability Report, Sustainability Performance Report, New Zealand Sustainability Review, Equator Principles and PRI Transparency Reporting, our Foundation’s reports as well as updates included in the Australian national Accessibility, Financial Inclusion and Reconciliation Action Plans.

Our annual sustainability reporting discloses the outcomes of our stakeholder engagement activities, together with the nature and types of concerns raised and actions taken during the year. Our disclosures regarding the effectiveness of our governance models are reviewed as part of the assurance of our sustainability performance reporting each year consistent with the AA1000 Assurance Principles Standard.

We also produce a slavery and human trafficking statement in line with our obligations under the United Kingdom’s Modern Slavery Act. The statement sets out the steps we take to help prevent slavery and human trafficking from taking place in our operations and supply chain.

7.5 Development and dissemination

This statement has been developed through our Group Sustainability Council with input from representatives across the Group that are responsible for the related policies, statements, frameworks and action plans. It has also been informed by input from external stakeholders with human rights expertise.

This statement, or a relevant summary of the statement or a translated version will be made available to all relevant stakeholders including and not limited to employees, business partners, customers, suppliers, as well as human rights defenders and community representatives.

This document is made available in Rich Text Format (RTF) for users with screen readers, and a summary translated into a number of foreign languages.

7.6 Review and approval

This statement is reviewed at least every three years, with the next review to be completed no later than May 2020. It has been approved by the Board and Group Executive Team, including the CEO.

“We also produce a slavery and human trafficking statement in line with our obligations under the United Kingdom’s Modern Slavery Act.”
Supporting Indigenous Australian prosperity:

Founded by Herb Smith, Dreamtime Tuka is a 100% Aboriginal owned native Australian bushfood business. As a Westpac business customer and Indigenous Australian supplier, Herb is planning to grow his Dreamtime Tuka business while strengthening his community’s foundations.
Related policies, statements, frameworks, and action plans

We develop and implement a range of strategic, compliance and risk-based mechanisms to respect and advance human rights across our organisation and in relation to our business activities. The table on the following page lists the related policies, statements, frameworks and action plans that align our human rights due diligence processes to the expectations of our stakeholders.
### Table 1

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<td>Domestic &amp; Family Violence Support Policy</td>
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<td>Employee Action Groups</td>
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<tr>
<th>Area/Role</th>
<th>Related policies and position statements[^14]</th>
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<td><strong>Customer service</strong></td>
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<td>New Zealand Sustainable Supplier Code</td>
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<td>Climate Change Position Statement and Action Plan</td>
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<td>Environmental Policy</td>
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[^14]: Group-wide unless otherwise stated. Refer to equivalent policies where they exist in one of our brands or global locations. Action Plans operate in Australia, unless otherwise stated.

[^15]: The privacy policy for each brand of the Westpac Group is available at each brand’s respective website.
Human Rights 2020
Action Plan
Our actions

Our actions to strengthen this framework

To strengthen our human rights framework we:

• Engage and participate in relevant industry and government discussions and reviews.
• Regularly review, consult on, and assess human rights issues that are salient to us and our stakeholders.
• Enhance human rights awareness and literacy of our employees through engagement, training and building capability.
• Will refine and evolve existing feedback channels to better identify and remedy human rights issues that arise.
• Will work with stakeholders to expand the understanding and application of the UN Guiding Principles on Business and Human Rights.
• Will report our human rights progress in line with the UN Guiding Principles Reporting Framework, including our public reporting on key areas of concerns raised by stakeholders and our response.
• Will develop a framework to better facilitate rights-based thinking into existing relevant decision-making and action-based forums.

Our actions as an employer

To improve human rights outcomes for our employees we:

• Continue to deliver against the Workforce Revolution strategic priority, including our health, safety, wellbeing and diversity commitments and performance targets.
• Continue to support the formation and activities of Employee Action Groups in Australia and New Zealand to strengthen workplace diversity and inclusion initiatives.
• Will deliver against the people-focused objectives of our Group Diversity Policy.
• Will deliver against the people-focused Training & Awareness and Workplace Environment commitments and performance targets outlined in our Accessibility Action Plan.
• Will deliver against the employee-focused Hardship Support, Financial Resilience and Inclusive Growth commitments and performance targets outlined in our Financial Inclusion Action Plan.
• Will deliver against the employee-focused Meaningful Careers, Strong Communities and Recognition & Advocacy commitments and performance targets outlined in our Reconciliation Action Plan.
Supporting Maori and Pasifika education: Westpac New Zealand hosts Maori and Pasifika youth from InZone Education Foundation for a workshop on careers and fundamental financial concepts.
Our actions as a customer service provider

To improve human rights outcomes in customer service delivery we:

• Continue to deliver against the Service Leadership strategic priorities, commitments and performance targets.

• Continue to increase access to financial services in our Pacific markets through specialised financial education, coupled with new digital and localised low cost banking options designed to suit Pacific populations.

• Will deliver against the customer service-focused objectives of our Group Diversity Policy.

• Will deliver against the customer service-focused Channels, Products & Services, and Financial Independence commitments and performance targets outlined in our Accessibility Action Plan.

• Will deliver against the customer service-focused Hardship Support, Financial Resilience and Inclusive Growth commitments and performance targets outlined in our Financial Inclusion Action Plan.

• Will deliver against the customer service-focused Financial Inclusion and Recognition & Advocacy commitments and performance targets outlined in our Reconciliation Action Plan.

Our actions as a buyer

To encourage improved human rights outcomes in our supply chain we:

• Deepen our understanding of the human rights impacts of our supply chain, train employees working with suppliers in high risk sectors and regions to better understand and therefore mitigate or manage the risks present, and regularly engage with suppliers operating in high risk sectors to provide additional levels of oversight and governance of supply chain risks where appropriate.

• Continue to extend the Responsible Sourcing Code of Conduct principles beyond Australia and New Zealand.

• Will deliver against the commitments and performance targets of our Group Supplier Inclusion & Diversity Policy.

• Will deliver against the supplier-focused Inclusive Growth commitments and performance targets outlined in our Financial Inclusion Action Plan.

• Will deliver against the supplier-focused Financial Inclusion commitments and performance targets outlined in our Reconciliation Action Plan.
## Our actions as a financial services provider

To influence human rights outcomes in our financing activities we:

- By 2020, require all customers that are growers, producers and processors of palm oil to be fully certified under the Roundtable for Sustainable Palm Oil (RSPO) and of soy to be fully certified under the Roundtable for Sustainable Soy (RTRS).

- Will provide additional guidance materials and training for employees working with customers in high risk sectors and regions, including increasingly for transactional banking clients in high risk geographies, where appropriate, commencing with Westpac Pacific.

- Will work with governments and industry stakeholders to influence meaningful and practical growth in a robust infrastructure and market for social and affordable housing.

- Will deliver against the financial service-focused Inclusive Growth commitments and performance targets outlined in our Financial Inclusion Action Plan.

- Will deliver against the financial service-focused Financial Inclusion commitments and performance targets outlined in our Reconciliation Action Plan.

## Our actions as a supporter of communities

To improve human rights outcomes in our communities we:

- Provide scholarships and grants to community leaders and individuals responding to critical social issues, community organisations undertaking recovery/resilience work following natural disasters, and social enterprises in Australia.

- Continue to expand and improve accessibility to financial education courses for Australian, Pacific and New Zealand communities.

- Will continue to develop partnerships with governments, donors and multilateral agencies that tackle the most pressing issues facing communities in our Pacific markets.

- Will deliver against the community-focused objectives of our Group Diversity Policy.

- Will deliver against the Accessible Communities commitments and performance targets outlined in our Accessibility Action Plan.


- Will deliver against the community-focused Strong Communities and Recognition & Advocacy commitments and performance targets outlined in our Reconciliation Action Plan.
Contact

For questions and comments please contact Westpac Group Sustainability.

sustainability@westpac.com.au