

Westpac Whistleblower Protection Policy

Westpac has a Whistleblower Protection Policy to protect employees who raise concerns about actual, suspected or anticipated wrongdoing within The Westpac Group. This is a summary of that policy.

The aim of this policy is to make employees feel confident about raising concerns internally, by offering a reporting and investigation mechanism that is objective, confidential and independent, and protects employees from reprisal or disadvantage.

The policy outlines activities of wrongdoing, such as:

- corrupt conduct;
- fraudulent or any other illegal activity;
- a substantial mismanagement of Westpac Group resources;
- conduct involving substantial risk to public health or safety;
- conduct involving substantial risk to the environment; or
- any other conduct that could cause loss to Westpac or become detrimental to Westpac.

The Westpac Group is committed to ensuring that our employees do not suffer disadvantage for reporting instances of wrongdoing to management.

- It is a breach of the Whistleblower Protection policy for any employee to cause disadvantage to a whistleblower and will result in disciplinary action which could include termination of employment.

Westpac has several channels for reporting wrongdoing, such as our

- (i) People Leaders
- (ii) The Group's People or HR teams
- (iii) Compliance representatives
- (iv) Financial Crime Management (Investigation Process) (if fraud or financial crime involved).

In addition to these channels we have whistleblowing reporting channels for employees who wish to report wrongdoing anonymously.

The whistleblower reporting channels are:

(i) Concern Online

This is our own internal reporting system which is used when an employee has

- determined that he/she needs to use a whistleblower reporting channel;
- does not have access to the intranet; and
- prefers to log their report in a system rather than by telephone.

(ii) The Employee Concern Hotline

The Employee Concern Hotline is operated by an external and independent professional services firm, with employees who are trained in confidential reporting and whistleblower protection. Employees can also contact the Employee Concern Hotline by email.

Protections offered through our whistleblower reporting channels

We offer our employees the option of reporting anonymously or identifying themselves if they choose to use a whistleblower reporting channel.

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The identity of employees raising concerns anonymously through Concern Online or the Employee Concern Hotline will remain anonymous unless they choose to disclose their identity.

Employees have the choice of whether to disclose their name, and if they choose to identify themselves, or if their identity becomes apparent by making a report, they have the option to ask the hotline provider or the Concern Online administrator to involve the Whistleblower Protection Officer (the "Protection Officer").

The Protection Officer is a senior Westpac employee who has the responsibility of providing individual employees with protection against disadvantage, and will contact the person to discuss their needs. The types of protections we make available will depend on the situation but could include:

- ensuring confidentiality in the investigation and protecting the employee's identity;
- monitoring and managing the behaviour of other employees;
- offering a leave of absence while a matter is investigated;
- relocating employees to a different working group or department; and
- rectification of any detriment an employee has suffered.

Investigation process

Investigation processes will vary depending on the precise nature of the conduct being investigated. All investigations must be conducted in a manner that is fair, objective and affords natural justice to all people involved. A matter will not be investigated by someone who is implicated in the concern.

We provide updates through the system to people who raise concerns and where an investigation shows that wrongdoing has occurred, we are committed to changing our processes and taking action in relation to employees who have behaved incorrectly. Where illegal conduct has occurred, this may involve reporting the matter to relevant authorities and in some cases the police.

Our policy also covers the option to take disciplinary action against anyone who deliberately makes a false or dishonest report. No action will be taken against an employee where the report was made in good faith but no wrongdoing was identified.

Governance

The Westpac Group is committed to complying with the laws and practices that protect the rights of people who raise compliance concerns, including the Australian Standard "Whistleblower Protection Programs for Entities", AS 8004-2003 and the New Zealand *Protected Disclosures Act (2000)*.

This policy is monitored and reviewed annually and statistics about reported concerns are reported on a quarterly basis to the Westpac Group Operational Risk & Compliance Committee. That Committee oversees this policy and undertakes a full policy review every 3 years.