

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 Suncorp and Employees (both past and present), Responsible Persons, Directors, Contractors, Auditors, Consultants, Suppliers and Service Providers ('Persons').

In addition, where Suncorp relies on an external organisation to manage aspects of the Whistleblower process on Suncorp's behalf, Suncorp will ensure that the external organisation complies with 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.

Policy Statements

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

Suncorp supports the raising of Reportable Conduct by a range of People.

In raising Reportable Conduct, a Person should ensure they are acting honestly, reasonably and with genuine belief over the conduct that they are raising. If a Person is unsure as to whether conduct constitutes Reportable Conduct, they should seek guidance from the Whistleblower Protection Officer.

Suncorp must include a summary of its Whistleblower Policy on its websites together with details of how to raise Reportable Conduct.

Suncorp will build awareness of the Whistleblower program and provide appropriate training to Employees covering details on what constitutes Reportable Conduct and how to raise it. Specialist training will be provided to Employees responsible for implementing key elements of the Whistleblower program.

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

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

- Internally by an Employee to their leader or through their leader’s reporting lines (including the Function’s CEO);
- Directly to the Whistleblower Protection Officer;
- Externally via the Suncorp Whistleblower Service (an independent and confidential channel); or
- Directly to the regulator or in the case of Reportable Conduct in New Zealand, to the Appropriate Authority.

The Suncorp Whistleblower Service contact details are below.

Phone	Australia: 1800 444 774 New Zealand: 0800 202 643
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 9691 8182

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

Suncorp must establish appropriate procedures to ensure that where Reportable Conduct is raised, steps are taken to ensure the Person will not be personally or financially disadvantaged, by reason of having made the disclosure. Suncorp must ensure that all reasonable steps are taken to protect the Whistleblower (and those responsible for the associated investigation and support) from any threatened or actual detrimental or Retaliatory Action as a result of raising Reportable Conduct.

Where a Whistleblower, or someone responsible for the Whistleblower investigation and support, believes that they have, or may be, subject to Retaliatory Action they should raise this in first instance with the Whistleblower Protection Officer. If they are not satisfied with the response, they can escalate to the Whistleblower Executive Champion.

Suncorp will provide support to a Whistleblower 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 Whistleblower.

A Whistleblower may also be entitled to protection from civil or criminal 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. The Person should seek advice from the Whistleblower Protection Officer where any doubt exists as to whether the Reportable Conduct may be considered as a Protected Disclosure.

A Whistleblower may not be protected if:

- they knowingly give false or incorrect information and/or makes 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).

Suncorp acknowledges that the Whistleblower may 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 Reportable Conduct and securely store all records

In raising Reportable Conduct, a Person may do so on an anonymous basis. The identity of the Person raising Reportable Conduct must 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 the Person's identity.

Suncorp must establish appropriate procedures to ensure that all Whistleblower matters are treated confidentially and securely.

A Whistleblower acknowledges and consents¹ that in raising Reportable Conduct certain information in connection with the matter may be disclosed for the purposes of complying with this Policy. This includes the disclosure of information to those assisting or otherwise involved in the investigation and 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; and/or
- to the Board and senior management of Suncorp for the purpose of reporting trends and insights.

Further, a Whistleblower may acknowledge and consent to their name and contact details being disclosed to the Whistleblower Protection Officer. The Whistleblower Protection Officer will seek the consent of the Whistleblower prior to their name and contact details being disclosed to any other party.

Suncorp must ensure that all records relating to the Reportable Conduct investigation are retained in secure central files by the Whistleblower Protection Officer for 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 evidence-based investigation process consistent with the requirements outlined in the Whistleblower Procedure. The Whistleblower Investigation Officer should be independent from the area of the business involved and have the required skill to manage and investigate the conduct raised. Suncorp will take reasonable steps to ensure investigations are conducted in a timely manner.

When conducting an investigation Suncorp will ensure the individual against whom the allegation is made is provided with the right of response.

¹ Such consent is taken to include consent for the purposes of section 156E(2)(c) of the *Life Insurance Act 1995*, section 38E(2) of the *Insurance Act 1932*, section 52E(2) of the *Banking Act 1959* and section 1317E(2) of the *Corporations Act 2001*.

Suncorp will take reasonable steps to ensure a Whistleblower 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 matters

Suncorp must ensure that its Whistleblower program is adequately resourced including the appointment of appropriately qualified individuals to act as:

- 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 disclosure received and protecting the Whistleblower.

Suncorp must establish appropriate procedures to report on trends and provide a summary of Whistleblower matters to the Board and senior management. 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 procedures developed to raise Reportable Conduct, including their rights and obligations.
- Act honestly, reasonably and with genuine belief over the 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 program, including responding to escalations and acting as an executive sponsor.

Whistleblower Protection Officer (“WPO”)

The WPO is usually the Executive Manager Group Compliance (or delegate) and is responsible for taking steps, so far as is reasonably practicable, to protect Whistleblowers, and accountable for the implementation of the Whistleblower program.

The WPO will:

- In respect of Whistleblower matters 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 Whistleblower;
- Report investigation updates and the outcome to the Whistleblower;
- 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 Whistleblower matters to the Board and senior management while maintaining the confidentiality and anonymity of the Whistleblower as required.

Whistleblower Investigation Officer

Following appointment, conduct an evidence based investigation process consistent with the requirements outlined in Whistleblower Procedure.

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 will:

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

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 Definitions 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; and— 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. <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— a disclosure is made in accordance with internal procedures, but there has been no action or recommended action within 20 working days.
Law	<p>All present and future laws, regulations, codes, ordinances, local laws, by-laws, orders, judgments, licences, rules, permits, agreements and requirements of all Government Agencies applicable in any jurisdiction in which activities contemplated by the Policy may take place.</p>
People / Person	<p>All Employees (including former Employees), Responsible Persons, Directors, Contractors, Auditors, Consultants, Suppliers and Service Providers.</p>
Protected Disclosure	<p>A Person's protection against civil, criminal 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:</p>

- 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);
- make the disclosure in accordance with the provisions of the respective Act and provide their name to the person or authority they are making the disclosure to;
- make the disclosure in good faith (required by the Corporations Act) or believe on reasonable grounds that the information is true or likely to be true (Protected Disclosures Act); and
- ensure the information being disclosed is not protected by legal professional privilege.

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 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; and
- For New Zealand Persons, without limiting the above definitions, any conduct that constitutes “serious wrongdoing” under the Protected Disclosures Act 2000.

Reportable Conduct under this Policy is not conduct which you would expect to arise in the normal course of business, examples of which are outlined in the Whistleblower Procedure.

Retaliatory Action

Action made against a Person by an Employee, Officer or External Workforce 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.

Whistleblower

A Person who makes, attempts to make or wishes to make a report in connection with Reportable Conduct (whether anonymously or not) and wishes to avail themselves of protection against reprisal for having made the report.

Policy Administration

Document Title	Whistleblower Policy
Version No.	9.1
Policy Owner	EGM Compliance and Regulatory Affairs
Policy Administrator	EM Compliance, Governance & Operations
Primary Relationship Policies (These must be read in conjunction with the Policy)	Code of Conduct Conflict of Interest Fit and Proper Anti-Fraud
Supporting frameworks, procedures or guidelines (These must be read and implemented in conjunction with the Policy as required)	Suncorp Whistleblower Service (Intranet page) Whistleblower Procedure
Date of publication/effective date	August 2006
Date of last review	18 January 2017
Next scheduled review	April 2018
Regulator (if applicable)	Australian Securities and Investment Commission (ASIC) Australian Prudential Regulatory Authority (APRA) Reserve Bank of New Zealand (RBNZ), Australian Stock Exchange (ASX) Financial Markets Authority (FMA)
Compliance Assurance	Supervision and monitoring of controls embedded in the Whistleblower Standard and Procedures. Audit (internal)
Approval Body	Suncorp Board

Policy History

Date	Comment	Version	Approval
12/02/2013	Policy approved at annual review.	5.0	BRC
15/08/2013	Policy ownership changed to reflect organisational change.	5.1	Risk Governance & Regulatory Affairs
14/11/2013	Inclusion of New Zealand regulatory requirements.	5.2	Vero NZ CRO Group Risk & Compliance
06/02/2014	Policy approved at annual review.	6.0	BRC
03/02/2015	Policy approved at annual review.	7.0	BRC
20/07/2016	Updated in accordance with the Group Policy Framework	8.0	BRC
06/02/2017	Updated to reflect ABA Principles	9.0	Board
24/11/2017	Updated to reflect inclusion of Whistleblower Service contact details	9.1	EGM Compliance and Regulatory Affairs