



## PURPOSE

The CBH Group is committed to the highest standards of conduct and ethical behaviour in its business activities and to promoting and supporting a culture of honest and ethical behaviour.

The purpose of this Whistleblower Policy is to encourage current and former managers, employees, contractors, suppliers, customers, agents, and brokers (or relatives or dependants of those individuals) (**Eligible Whistleblowers**) to raise any concerns and report instances of improper or corrupt conduct, where there are reasonable grounds to suspect such conduct (a **Disclosure**), and to provide assurance and protection that they may do so without fear of intimidation, disadvantage, or reprisals.

An Eligible Whistleblower will still qualify for protection under this policy, the Corporations Act and/or the Taxation Administration Act (the "Acts") even if their Disclosure subsequently turns out to be incorrect.

## Reportable Conduct

This Policy is intended to encourage Eligible Whistleblowers to make a Disclosure of any issues that concern misconduct or an improper state of affairs in relation to CBH, a member of the CBH Group, or an officer or employee of the CBH Group or that represents a danger to the public or the financial system (**Reportable Conduct**) and to be provided protection for doing so. Reportable Conduct as defined by this policy encompasses conduct which:

- is dishonest, fraudulent, or corrupt;
- is illegal;
- is unethical or in contravention of the CBH Code of Conduct (The Way We Work);
- may cause financial or non- financial loss to the CBH Group;
- may cause reputational damage to the CBH Group;
- involves any other kind of serious impropriety.

Reportable Conduct is not intended to include personal work-related grievances related to the Eligible Whistleblower's employment (or former employment) which has implications for the Eligible Whistleblower personally and does not have significant implications for the CBH Group generally. Disclosures solely about a personal work-related grievance do not qualify for protection under the Acts or this Policy. A personal work-related grievance may be:

- (a) an interpersonal conflict between the Eligible Whistleblower and another employee;
- (b) a decision that does not involve a breach of workplace laws;
- (c) a decision about the engagement, transfer, or promotion of the Eligible Whistleblower;
- (d) a decision about the terms and conditions of engagement of the Eligible Whistleblower; or
- (e) a decision to suspend or terminate the engagement of the Eligible Whistleblower, or otherwise to discipline the Eligible Whistleblower.

Disclosures that contain information about a personal work-related grievance may still qualify for protection if:

- (a) it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- (b) the entity has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the Disclosure relates to information that suggests misconduct beyond the Eligible Whistleblower's personal circumstances;
- (c) the Eligible Whistleblower suffers from or is threatened with detriment for making an eligible Disclosure; or
- (d) the Eligible Whistleblower seeks legal advice or legal representation about the operation of the whistleblower protections under the Acts.

## **PRINCIPLES**

The CBH Group recognises that it may be difficult for Eligible Whistleblowers to make a Disclosure, and therefore has established processes to facilitate and encourage such reporting.

The Chief Audit and Risk Officer is the assigned Whistleblower Protection Officer (**WPO**) and is accessible to all staff who may have queries about this policy or the process for making Disclosures or to receive a Disclosure. The WPO contact details are:

Email: rob.maurich@cbh.com.au  
Mobile: 0438 984 261  
In writing: Rob Maurich, Private and Confidential,  
Level 6, 240 St Georges Terrace, Perth WA 6000

CBH Group expects Eligible Whistleblowers who become aware of the occurrence of Reportable Conduct to report their suspicions. Disclosures may be verbal or written and should be made to the WPO, a member of the Executive Team, an officer or auditor of the entity concerned or to the external whistleblower hotline (referred to below) (**Eligible Recipients**) as soon as suspected or known. Eligible Whistleblowers must make a Disclosure to an Eligible Recipient to qualify for protection under the Acts.

Disclosures relating to Reportable Conduct can also be made to Australian Securities and Investment Commission ("ASIC"), Australian Prudential Regulatory Authority ("APRA") or another Commonwealth body prescribed by regulation and can qualify for protection under the Acts. Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Acts are protected (even if the legal practitioner concludes that a Disclosure does not relate to Reportable Conduct).

Additionally, Disclosures can be made to a journalist or parliamentarian where they amount to a public interest disclosure or an emergency disclosure. The circumstances in which these Disclosures may be made are detailed in the Acts and should an Eligible Whistleblower wish to make such a Disclosure it is advisable to obtain legal advice beforehand as the law is complex.

It is important that an Eligible Whistleblower understands that before making a public interest or emergency disclosure:

- a Disclosure of Reportable Conduct must have previously been made to ASIC, APRA or a prescribed body; and

- written notice must be 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.

The CBH Group is committed to:

- Ensuring the identity of an Eligible Whistleblower who makes a report under this Policy is kept confidential and not disclosed to any person other than the recipient of the Disclosure, any person the Eligible Whistleblower has consented to or as permitted by law;
- Ensuring that the Eligible Whistleblower does not suffer any detriment as a result of making the Disclosure; and
- Taking reasonable steps when conducting investigations to avoid an Eligible Whistleblower's identity being readily ascertainable.

It is noted that depending on the nature of the conduct, disclosure to a body external to the CBH Group may be required and may still qualify for protection.

If a Disclosure is made anonymously the veracity of the assertions may not be able to be confirmed or clarified and as such it is desirable that the whistle-blower identify themselves in making any such assertions. However, Eligible Whistleblowers are entitled to make the Disclosure anonymously and CBH will take steps to protect the whistleblower's anonymity, including by:

- CBH's external whistleblower hotline either not obtaining identity details or not providing the name of the whistleblower to CBH staff; and
- CBH's WPO maintaining the identity of the Eligible Whistleblower in confidence and holding those details in a secure fashion not available to others.

Where Disclosures are made anonymously, these will be investigated, and consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from other sources.

Where a Disclosure is made under this Whistleblower Policy:

- The whistle-blower must have reasonable grounds to believe that the information disclosed concerns Reportable Conduct; and
- The CBH Group will provide protection to the Eligible Whistleblower making the Disclosure and ensure that they are not victimised and do not face reprisals as a result of making the Disclosure.

Whistleblowers are entitled to certain legal protections under the Acts including:

- identity protection (confidentiality) mentioned previously;
- protection from detrimental acts or omissions;
- compensation and other remedies; and
- civil, criminal, and administrative liability protection.

These protections apply not only to internal Disclosures, but to Disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Acts.

### **Identity protection**

It is illegal for a person to identify an Eligible Whistleblower or disclose information that is likely to lead to the identification of the Eligible Whistleblower, outside the exceptions prescribed by law or regulation.

Exceptions are if a person discloses the identity of the Eligible Whistleblower:

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

CBH may disclose the information contained in a Disclosure with or without the Eligible Whistleblower's consent if:

- (a) the information does not include the Eligible Whistleblower's identity;
- (b) the entity has taken all reasonable steps to reduce the risk that the Eligible Whistleblower will be identified from the information; and
- (c) it is reasonably necessary for investigating the issues raised in the Disclosure.

### **Protection from detrimental acts or omissions**

A person cannot engage in conduct that causes detriment to an Eligible Whistleblower (or another person), in relation to a Disclosure, if:

- (a) the person believes or suspects that the Eligible Whistleblower (or another person) made, may have made, proposes to make, or could make a Disclosure that qualifies for protection; and
- (b) the belief or suspicion is the reason, or part of the reason, for the conduct.

A person cannot make a threat to cause detriment to an Eligible Whistleblower (or another person) in relation to a Disclosure. A threat may be express or implied, or conditional or unconditional. An Eligible Whistleblower (or another person) who has been threatened in relation to a Disclosure does not have to actually fear that the threat will be carried out.

Detrimental conduct includes:

- (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.

### **Compensation and other remedies**

An Eligible Whistleblower (or any other employee or person) can seek compensation and other remedies through the courts if:

- (a) they suffer loss, damage or injury because of a Disclosure; and
- (b) the relevant CBH Group entity failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

### **Civil, criminal and administrative liability protection**

An Eligible Whistleblower is protected from any of the following in relation to their Disclosure of Reportable Conduct:

- (a) civil liability (e.g., any legal action against the Eligible Whistleblower for breach of an employment contract, duty of confidentiality or another contractual obligation);
- (b) criminal liability (e.g., attempted prosecution of the Eligible Whistleblower for unlawfully releasing information, or other use of the Disclosure against the Eligible Whistleblower in a prosecution (other than for making a false disclosure)); and
- (c) administrative liability (e.g., disciplinary action for making the Disclosure).

The CBH Group will support Eligible Whistleblowers through utilising techniques that are appropriate for each case, which may include:

- assessing the risk of detriment against an Eligible Whistleblower and other persons (e.g., other staff who might be suspected to have made a Disclosure), which will commence as soon as possible after receiving a Disclosure of Reportable Conduct;
- making support services (including counselling or other professional services) available to Eligible Whistleblowers;
- developing strategies to help an Eligible Whistleblower minimise and manage stress, time or performance impacts, or other challenges resulting from the Disclosure or its investigation;
- taking actions for protecting an Eligible Whistleblower from risk of detriment;
- reinforcing processes for ensuring that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, an Eligible Whistleblower;
- considering procedures on how an Eligible Whistleblower can lodge a complaint if they have suffered detriment, and the actions the entity may take in response to such complaints; and
- interventions for protecting an Eligible Whistleblower if detriment has already occurred.

### **Handling and investigating a disclosure**

Where CBH receives a Disclosure under or in connection with this policy, CBH will need to assess each Disclosure to determine whether:

- (a) it constitutes Reportable Conduct and qualifies for protection; and
- (b) a formal, in-depth investigation is required.

CBH may not be able to undertake an investigation if it is not able to contact the Eligible Whistleblower (e.g., if a Disclosure is made anonymously and the Eligible Whistleblower has refused to provide, or has not provided, a means of contacting them).

In practice, CBH requests the Eligible Whistleblower for consent to a limited disclosure (e.g., disclosure to the CBH's WPO and CBH's Whistleblower Investigation Officer (WIO)) in order to assist an investigation to be carried out. If granted, the investigation will be conducted by the WIO, who will be the Manager - Group Risk, Quality & Assurance, or any other person specified by the WPO. Investigations may also be

outsourced to specialist investigating firms. The WIO should be independent of the area affected by the reportable conduct.

CBH will investigate Disclosures of Reportable Conduct made under this policy in a timely, thorough, confidential, objective, and fair manner and as is reasonable having regard to the nature of the Disclosure and all of the circumstances. Whilst CBH targets a resolution of each Disclosure of Reportable Conduct within 45 days, this is not a binding time limit. The precise timeframe an investigation may take will depend on:

- (a) the nature of the Disclosure;
- (b) the level of detail included in the Disclosure; and
- (c) the ability of CBH to conduct that investigation in a manner which does not disclose, or be likely to disclose, the identity of the Eligible Whistleblower.

Where appropriate, if CBH has the means to contact the Eligible Whistleblower, feedback will be provided to the Eligible Whistleblower regarding the Disclosure and any investigation's progress and/or outcome (subject to considerations of the privacy of, and fairness in relation to, those against whom allegations are made).

All CBH Group managers, employees and contractors are under obligation both expressly and implied in their contract of employment to give honest and loyal service to CBH. This includes an obligation not to act in a manner that will undermine the mutual trust and confidence on which the employment relationship is based such as by making deliberately false Disclosures which will waste CBH Group resources. The CBH Group does not tolerate dishonest, improper, or corrupt conduct by its managers, employees, or contractors.

To the extent that an individual is the subject of a Disclosure under this Policy, CBH will use the following measures and/or mechanisms for ensuring fair treatment of individuals mentioned in a Disclosure (where applicable):

- all Disclosures will be handled confidentially when it is practical and appropriate in the circumstances;
- each Disclosure will be assessed and may be the subject of an investigation;
- the objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported;
- when an investigation needs to be undertaken, the process will be objective, fair and independent;
- an employee who is the subject of a Disclosure will be advised about the subject matter of the Disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken—for example, if the Disclosure will be the subject of an investigation; and
- an employee who is the subject of a Disclosure may contact the entity's support services (e.g., counselling).

CBH will document and record all Disclosures and their resolution in a secure manner, including by anonymising details of the Disclosure in order to protect an Eligible Whistleblower's identity. The CBH WPO is required to report (in an anonymous and summarised form), the nature and outcome of each Disclosure received to the CBH Board's Audit and Risk Management Committee (ARMC).

**External Whistleblower Hotline**

If an employee or third party is not comfortable to make a Disclosure to the WPO, a member of the Executive Team, Officer, or Auditor, they are encouraged to make a report to the dedicated hotline below which is operated externally, securely, and confidentially by Deloitte.

A Disclosure to Deloitte Whistleblower Services may be provided on an anonymous basis (where no identity is required), partially anonymous (where identity is known to Deloitte only), or on a confidential basis where the Eligible Whistleblower’s identity is disclosed only to Deloitte and to the CBH WPO and WIO.

It would assist any investigation of the Disclosure if the identity of the Eligible Whistleblower is disclosed to the CBH WPO. All Disclosures to Deloitte Whistleblower Services will be notified to the WPO and WIO for investigation.

Website: [www.cbhwhistleblower.deloitte.com.au](http://www.cbhwhistleblower.deloitte.com.au)  
 Email: [CBHwhistleblower@deloitte.com.au](mailto:CBHwhistleblower@deloitte.com.au)  
 Phone: 1800 986 457  
 Fax: +61 3 9691 8182  
 Post: CBH Whistleblower Hotline  
 Reply Paid 12628  
 A’Beckett Street  
 Melbourne Vic 8006

Deloitte Whistleblower Services are available 24 hours a day, 7 days a week.

**ROLES AND RESPONSIBILITIES**

The following roles have responsibilities associated with the obligations of this Policy:

Role	Responsibilities
Board of Directors	Through the ARMC, it is the Board’s responsibility to: <ul style="list-style-type: none"> <li>▪ Review the effectiveness of the system for monitoring compliance with laws, regulations, internal policies and industry standards and the results of management’s investigation and follow-up (including disciplinary action) of fraudulent / corrupt acts or non-compliance;</li> <li>▪ Review the effectiveness of this policy and the associated framework in place on a triennial basis or as required; and</li> <li>▪ Review the anonymous and summarised investigation reports following the completion of an investigation of a Disclosure under this policy.</li> </ul>
Eligible Recipients	<ul style="list-style-type: none"> <li>▪ Manage Disclosures made directly to them in accordance with this Policy.</li> </ul>
Management	<ul style="list-style-type: none"> <li>▪ Create, maintain, and promote a culture of honesty, integrity, and compliance;</li> <li>▪ Ensure awareness of this policy and its content;</li> <li>▪ Uphold the principles outlined within this policy;</li> <li>▪ Develop and maintain an appropriate oversight and investigation process; and</li> <li>▪ Protect Eligible Whistleblowers from suffering detrimental effects resulting from whistleblowing.</li> </ul>
Whistleblower Protection Officer (WPO)	<ul style="list-style-type: none"> <li>▪ Ensure adequate procedures exist to capture, manage, and investigate all genuine claims made under this policy;</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>▪ Obtain updates on investigations under this policy, ensure the identity of Eligible Whistleblowers remains confidential (within the requirements of law) and protect people who make Disclosures under this policy from intimidation, disadvantage, or reprisals;</li> <li>▪ Inform the Chairman of the ARMC and the CEO (provided there is no conflict) of any serious or material claims under this policy, providing regular updates to both roles throughout the investigation and subsequent processes;</li> <li>▪ Ensure Eligible Recipients understand their obligations under the Acts and this Policy; and</li> <li>▪ Direct the WIO or specialist investigator to conduct investigations.</li> </ul>
Whistleblower Investigation Officer (WIO)	<ul style="list-style-type: none"> <li>▪ Conduct the investigation into Disclosures where directed by the WPO.</li> </ul>

## REFERENCES

The following references are referred to in this Policy and supporting resources.

**Table 1: External References**

Reference
Corporations Act 2001
Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019

**Table 2: CBH References**

Reference	STORE ID
Fraud and Corruption Policy	<a href="#">STORE-1473931053-288</a>
The Way We Work Business Code of Conduct	<a href="#">STORE-1473931053-831</a>
Employee Management and Discipline Procedure	<a href="#">STORE-1473931053-259</a>

## COMMUNICATION

Amendments to this Policy shall be communicated to the CBH Group under the direction of the Chief Audit and Risk Officer. This Policy shall be made available and communicated to all CBH employees, contractors and visitors via a range of channels, including the CBH Intranet, CBH’s external website, emails, posters, training, and induction sessions.

## CHANGE MANAGEMENT

Changes to this document shall be managed, reviewed, and updated as described in the Document Control Content and Records Management Group Procedure.



## DOCUMENT CONTROL

### Authorities

<b>Approved By</b>	Audit and Risk Management Committee	<b>Approval Date</b>	16/02/2023
<b>Review Frequency</b>	Triennial	<b>Next Review Date</b>	06/06/2026
<b>Owner</b>	Chief Audit and Risk Officer	<b>Custodian</b>	Manager - Group Risk, Quality & Assurance
<b>Division</b>	Legal and Risk	<b>Department</b>	Risk and Assurance

### Review History

Version	Date	Author	Description of Revision
1.0	04/10/2016	ARMC	Approved for use, published
2.0	04/06/2019	ARMC	Approved for use, published
3.0	21/02/2020	ARMC	Approved for use, published
3.1	14/07/2020	Group Risk, Quality & Assurance Manager	Reference to 'General Manager' updated to align with role title changes, replaced with 'member of Lead Team', published
3.2	01/02/2023	Chief Audit & Risk Officer	Reference to 'Lead Team' replaced with "Executive Team"