

Whistleblower Protection Policy

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1. Purpose

The purpose of this Policy is to set out and demonstrate NPBS' commitment to:

- encouraging a “speak up” culture that encourages Disclosures;
- ensuring Disclosures can be made safely and Disclosers feel confident that they will be protected and supported;
- ensuring transparency around the NPBS' framework for receiving, handling and investigating Disclosures;
- deterring misconduct and wrongdoing.

The Policy has been developed in accordance with applicable legislation and regulatory standards, and outlines how a Disclosure can be made, the protections available to Disclosers, how Disclosures will be investigated and who to contact to obtain further information about this Policy.

2. Scope

This Policy applies to Personnel of NPBS, as well as other Disclosers, as defined in this Policy.

In this Policy NPBS includes:

- Newcastle Permanent Building Society Limited ACN 087 651 992;
- Newcastle Permanent Community Foundation Company Limited ACN 092 437 379, and Newcastle Permanent Charitable Foundation ABN 26 589 812 647 (a trust) (**NPCF**);
- Newcastle Friendly Society Limited ABN 12 087 648 780 (**NFS**); and
- related bodies corporate of the above entities.

3. Definitions

The following terms are used throughout this Policy.

Term	Definition
Confidential Information	<p>means:</p> <ul style="list-style-type: none"> • the identity of a Discloser; or • information that is likely to lead to the identification of the Discloser, <p>who has made a Disclosure, where the information is obtained directly or indirectly because of the Disclosure.</p>
Decision-maker	<p>means the person(s) appointed under section 10.5 of this Policy that will determine the actions to be taken as a result of an investigation into a Disclosure.</p>

Term	Definition
Disclosable Matters	<p>means information a Discloser has reasonable grounds to suspect concerns:</p> <ul style="list-style-type: none"> • misconduct; or • an improper state of affairs or circumstances in relation to NPBS, <p>which may or may not involve unlawful conduct. For example, the information may indicate a systemic issue, dishonest or unethical behaviour, conduct prohibited by NPBS' Code of Conduct, or significant risk to public safety or the stability of, or confidence in, the financial system.</p> <p>Disclosable Matters also include information the Discloser has reasonable grounds to suspect indicates NPBS or an Officer or employee of NPBS has engaged in conduct which:</p> <ul style="list-style-type: none"> • constitutes an offence against, or contravention of: <ul style="list-style-type: none"> ○ the Corporations Act; ○ the ASIC Act; ○ the Banking Act; ○ the Financial Sector (Collection of Data) Act; ○ the Insurance Act; ○ the Life Insurance Act; ○ the National Consumer Credit Protection Act; ○ the Superannuation Industry (Supervision) Act, or ○ an instrument made under any of the above legislation; • constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or • represents a danger to the public or the financial system. <p>In relation to Tax Affairs, Disclosable Matters means information the Discloser has reasonable grounds to suspect concerns:</p> <ul style="list-style-type: none"> • misconduct; or • an improper state of affairs or circumstances in relation to the Tax Affairs of the entity or an associate (within the meaning of the Income Tax Assessment Act) of NPBS, <p>where the Discloser considers that the information may assist an Eligible Recipient to perform functions or duties in relation to the Tax Affairs of NPBS or an associate (within the meaning of the Income Tax Assessment Act) of NPBS.</p> <p>Disclosable Matters generally do not include customer complaints about products or services or Personal Work-Related Grievances.</p>

Term	Definition
Discloser	<p>means any individual (current or former) listed below:</p> <ul style="list-style-type: none"> • an Officer of NPBS; • an employee of NPBS; • an individual who supplies services or goods to NPBS (whether paid or unpaid); • an employee of a person who supplies services or goods to NPBS (whether paid or unpaid); • an individual who is an associate (within the meaning of in the Corporations Act and the Income Tax Assessment Act, as applicable) of NPBS; and • a relative, dependent or spouse of any of the above (this includes a parent or other linear ancestor, child or grandchild, and sibling).
Disclosure	<p>means a report of Disclosable Matters made by a Discloser to an Eligible Recipient.</p>
Eligible Recipient	<p>means each of the following is an Eligible Recipient in relation to NPBS:</p> <ul style="list-style-type: none"> • ASIC; • APRA; • an Officer or Senior Manager of NPBS; • an auditor, or a member of an audit team conducting an audit of NPBS; • an actuary of NPBS; • any other person authorised by NPBS to receive Disclosures under this Policy either via an Internal or External Reporting Channel. <p>In relation to Tax Affairs, each of the following is also an Eligible Recipient in relation to NPBS:</p> <ul style="list-style-type: none"> • the Tax Commissioner; • any other employee or Officer of NPBS who has functions or duties that relate to the Tax Affairs of NPBS; • a registered tax agent or BAS agent (within the meaning of the Tax Agent Services Act) who provides tax agent services or BAS services to NPBS.

Term	Definition
Emergency Disclosure	<p>means a Disclosure made to:</p> <ul style="list-style-type: none"> • a member of the Parliament of the Commonwealth; • a member of the Parliament of a State or the legislature of a Territory; or • a journalist, <p>in circumstances where:</p> <ul style="list-style-type: none"> • the Discloser has previously made the Disclosure to ASIC and/or APRA; • the Discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; • the Discloser gave the body to whom the previous Disclosure was made a written notification that: <ul style="list-style-type: none"> ○ includes sufficient information to identify the previous Disclosure; and ○ states the Discloser intends to make an Emergency Disclosure; and • the extent of the information disclosed in the Emergency Disclosure is no greater than is necessary to inform the recipient of the substantial and imminent danger.
External Reporting Channel	<p>means Eligible Recipients external to NPBS including:</p> <ul style="list-style-type: none"> • KPMG FairCall Service; • external regulatory bodies such as APRA, ASIC and the Tax Commissioner; • an external auditor or audit partner/s.
FairCall Report	<p>means a written report provided to NPBS from KPMG which details a Disclosure using the FairCall Service.</p>
FairCall Service	<p>means an independently monitored, external, anonymous service provided by KPMG for the purpose of receiving a Disclosure.</p>
Internal Reporting Channel	<p>means Eligible Recipients within NPBS including:</p> <ul style="list-style-type: none"> • an Officer or Senior Manager of NPBS; • an internal auditor, or a member of an audit team conducting an audit of NPBS; • the actuary of NPBS; • the Whistleblower Protection Officer; and • the Whistleblower Investigation Officer.
KPMG	<p>means KPMG Forensic Pty Ltd (ABN 91 055 053 417), the current supplier of the NPBS FairCall Service.</p>

Term	Definition
Officer	has the same meaning as contained in the Corporations Act and in respect to NPBS, refers to a Director or a Member of the Executive Committee.
Personal Work-Related Grievance	<p>means information disclosed by a person:</p> <ul style="list-style-type: none"> • concerning a grievance about any matter in relation to a person's employment, or former employment, having (or tending to have) implications for the person personally; and • does not have significant implications for NPBS, or another regulated entity, that do not relate to the person; and • does not concern Disclosable Matters, or alleged Disclosable Matters. • does not concern Reprisal or alleged Reprisal. <p>Examples of Personal Work-Related Grievances include:</p> <ul style="list-style-type: none"> • an interpersonal conflict between the person and another employee; • decisions regarding the engagement, promotion or discipline of the person that do not involve a breach of workplace laws punishable by 12 months imprisonment.
Personnel	<p>means:</p> <ul style="list-style-type: none"> • an Officer of NPBS; • an employee of NPBS; • an individual who supplies services or goods to NPBS (whether paid or unpaid); • an employee of a person who supplies services or goods to NPBS (whether paid or unpaid); • an individual who is an associate (within the meaning of the Corporations Act and the Income Tax Assessment Act, as applicable) of NPBS.

Term	Definition
Public Interest Disclosure	<p>means a Disclosure to:</p> <ul style="list-style-type: none"> • a member of the Parliament of the Commonwealth; • a member of the Parliament of a State or the legislature of a Territory; or • a journalist, <p>in circumstances where:</p> <ul style="list-style-type: none"> • the Discloser has previously made the Disclosure to ASIC and/or APRA; • at least 90 days have passed since the Disclosure to APRA and/or ASIC was made; • the Discloser does not have reasonable grounds to believe that action is being, or has been, taken to address the matters to which the Disclosure to APRA and/or ASIC related; • the Discloser has reasonable grounds to believe that making the further Disclosure to: <ul style="list-style-type: none"> ○ a member of the Parliament of the Commonwealth; ○ a member of the Parliament of a State or the legislature of a Territory; or ○ a journalist, would be in the public interest; • after 90 days has passed since the Disclosure to APRA and/or ASIC was made the Discloser gave the body to whom the Disclosure was previously made a written notification that: <ul style="list-style-type: none"> ○ includes sufficient information to identify the previous Disclosure; and ○ states the Discloser intends to make a Public Interest Disclosure; and • the extent of the information disclosed in the Public Interest Disclosure is no greater than is necessary to inform the recipient of the Disclosable Matters.

Term	Definition
Reprisal	<p>means subjecting or threatening (intentionally or recklessly) to subject a Discloser to damage, including:</p> <ul style="list-style-type: none"> • dismissal of an employee; • alteration of an employee’s position or duties to their disadvantage; • discrimination against an employee; • harassment or intimidation, • harm or injury; • damage to property; • damage to reputation; • damage to business or financial position, <p>because, or partly because, of a belief or suspicion that the Discloser, or potential Discloser, has made, may have made or may make a Disclosure.</p> <p>Reprisal does not include:</p> <ul style="list-style-type: none"> • reasonable administrative action taken to protect a Discloser from Reprisal; and • managing a Discloser’s work performance, in line with NPBS’ performance management processes.
Senior Manager	has the same meaning as contained in the Corporations Act, and in respect to NPBS, means the Senior Managers set out in Schedule 1 of the Responsible Person Fitness and Accountability Procedure Manual on CDMS .
Tax Affairs	means affairs relating to all taxes imposed by or under, or assessed or collected under, all laws administered by the Tax Commissioner.
Whistleblower Investigation Officer	means the role appointed under section 11.6 of this Policy.
Whistleblower Protection Officer	means the role appointed under section 11.5 of this Policy.

4. Benefits of a Whistleblower Protection Policy

This Policy is an important tool for NPBS to prevent and detect Disclosable Matters. It demonstrates NPBS’ commitment to being honest, fair and ethical and aligns with NPBS’ core values and Code of Conduct. It also supports:

- good corporate culture and governance;
- NPBS’ long-term sustainability and reputation; and
- compliance with NPBS’ legal and regulatory obligations.

This Policy helps ensure Disclosers feel comfortable about making Disclosures safely and securely, by offering the ability for Disclosures to be made via Internal and External Reporting Channels (see section 5).

5. Duty to Disclose

NPBS endeavors to provide a working environment that is free of corrupt, fraudulent, illegal and improper conduct or activities.

Where a Discloser has reasonable grounds to suspect that Disclosable Matters have occurred, it is the Discloser's duty to make a Disclosure in accordance with this Policy as soon as practicable. Disclosures are important tool to assist NPBS' risk management and corporate governance frameworks.

Disclosable Matters in relation to NPBS, may include:

- breaches of NPBS' Code of Conduct, policies, procedures or compliance obligations;
- unlawful conduct, such as theft or acceptance of bribery
- fraud, money laundering or misappropriation of funds;
- non-compliance with legal or regulatory obligations; and
- engagement in, or threatening, Reprisal against a Discloser or suspected Discloser.

6. Protections for Disclosers

NPBS is committed to supporting Disclosers. Disclosers who make a Disclosure are protected under this Policy and the Corporations Act.

NPBS also encourages Disclosers to seek independent legal advice about their rights and the protections that may apply to them as a result of making a Disclosure.

6.1 Identity Protection (Confidentiality)

NPBS is committed to protecting the Confidential Information of a Discloser who makes a Disclosure and may only disclose this Confidential Information:

- to a legal practitioner for the purpose of obtaining legal advice or legal representation;
- with the consent of the Discloser; or
- to ASIC, APRA, the ATO or a member of the Australian Federal Police or a Commonwealth authority, or a State or Territory authority, for the purpose of assisting the authority in the performance of its functions or duties, or
- where the disclosure of the Confidential Information:
 - does not contain the identity of the Discloser;

- is reasonably necessary for the purposes of investigating the Disclosable Matters to which the Disclosure relates; and
- NPBS takes all reasonable steps to reduce the risk that the Discloser will be identified as a result of the disclosure of the Confidential Information, or
- where otherwise permitted or required by law.

Personnel who disclose Confidential Information, other than in accordance with this Policy, may be subject to disciplinary action and penalties under applicable legislation.

A Discloser who has concerns about a breach of their Confidential Information should contact the Whistleblower Protection Officer. If such a report is made, the Whistleblower Protection Officer will:

- assess the immediate welfare and protection needs of the Discloser and provide appropriate support;
- record details of the breach or suspected breach;
- report the matter to the Whistleblower Investigation Officer for assessment and, if required, investigation in accordance with this Policy.

NPBS will ensure Confidential Information is protected by applying secure record-keeping and information sharing practices.

A Discloser may seek independent legal advice or contact regulatory bodies, such as ASIC or APRA, if they believe their Confidential Information has been improperly disclosed.

6.2 Protection from Reprisal

NPBS will not tolerate Reprisal against Disclosers and will take steps to prevent Reprisal from occurring in accordance with its legal obligations.

Personnel found to have engaged in Reprisal or otherwise:

- aid, abet, counsel or procure Reprisal;
- induce Reprisal, by threats promises or otherwise;
- in any way, by act or omission, directly or indirectly, be knowingly concerned in or a party to Reprisal; or
- conspire with others to effect Reprisal,

will be subject to disciplinary action by NPBS and may be exposed to penalties under applicable legislation.

Any incidents of Reprisal or suspected Reprisal should be reported to the Whistleblower Protection Officer. If such a report is made, the Whistleblower Protection Officer will:

- assess the immediate welfare and protection needs of the Discloser and provide appropriate support;

- record details of the Reprisal or suspected Reprisal; and
- report the Reprisal or suspected Reprisal to the Whistleblower Investigation Officer for assessment and, if required, investigation in accordance with this Policy.

Any reports of Reprisal that involve the Whistleblower Protection Officer should be reported directly to the Company Secretary or via the FairCall Service.

A Discloser may seek independent legal advice or contact regulatory bodies, such as ASIC or APRA, if they believe they have suffered Reprisal.

6.3 Compensation, remedies and protection from liability

A Discloser who makes a Disclosure will generally be protected from the following for making the Disclosure:

- civil liability (for example, legal action against the Discloser for breach of employment contract or duty of confidentiality);
- criminal liability (for example, attempted prosecution of the Discloser for unlawfully releasing information, or other use of the Disclosure in a prosecution, other than for making a false Disclosure); and
- administrative liability (for example, disciplinary action).

However, a Discloser may still be subject to civil, criminal or administrative liability (including disciplinary action) in relation to any conduct of the Discloser that is revealed by the Disclosure.

A Discloser who makes a Disclosure may also seek compensation and other legal remedies if:

- the Discloser is subjected to Reprisal and incurs loss, damage or injury as a result; and
- NPBS had a duty to prevent, or take reasonable steps to prevent, the Reprisal and failed to comply with that duty.

NPBS encourages Disclosers to seek independent legal advice about such protections and potential remedies.

7. Excluded Matters

Reports that do not involve Disclosable Matters will not be covered by this Policy and are not protected under the Corporations Act. However, such reports may attract protections under other legislation, such as Fair Work Act.

Examples of the matters that are generally not intended to be covered by this Policy include:

7.1.1 Customer Complaints

Customer complaints regarding the way NPBS has handled a matter, product or service will generally not be covered by this Policy.

Customers are encouraged to raise such complaints in writing, through one of our branches, or by calling 13 19 87. Please refer to the NPBS website [here](#) for further information on NPBS' complaints management and dispute resolution processes.

7.1.2 Personal Work-Related Grievances

Personal Work-Related Grievances will generally not be covered under this Policy and will not be protected under the Corporations Act, unless:

- the report also concerns Disclosable Matters or information that suggests misconduct beyond the discloser's personal circumstances (a mixed report);
- the report concerns Reprisal or alleged Reprisal;
- the Discloser seeks legal advice or legal representation about the operation of protections under the Corporations Act.

NPBS employees are encouraged to raise such Personal Work-Related Grievances via their Line Manager or HR Business Partner.

8. Making a Disclosure

Disclosures can be made orally or in writing. However, a Discloser should ensure, to the extent that is possible in the circumstances, that their Disclosure:

- is clear, based on facts and first-hand knowledge;
- does not omit material information; and
- is not biased, or discloses facts that may give rise to a perception of bias.

8.1 False Reports

Personnel must not make a report that they know to be untrue.

Personnel who make a false report will be subject to disciplinary action. Protections under the Corporations Act will also not apply to any person who makes a false report.

However, a Discloser can still qualify for protection even if their Disclosure turns out to be incorrect. No disciplinary action will be taken against a Discloser who makes a Disclosure in circumstances where they had reasonable grounds to suspect Disclosable Matters have occurred even if no actual Disclosable Matters are subsequently identified.

8.2 Anonymous Disclosures

A Discloser does not need to identify themselves when making a Disclosure under this Policy, and can choose to remain anonymous for the duration of the investigation process.

A Discloser can refuse to answer any questions asked in follow up discussions if they feel their identity may be disclosed. If they wish, a Discloser may also adopt a pseudonym when making a Disclosure to protect their identity.

Where an anonymous Disclosure is made, the Discloser will be encouraged to maintain communication with the Whistleblower Protection Officer for the purpose of the investigation process.

However, if a Disclosure has been made anonymously and the Discloser refuses to communicate during the investigation process, this may impact the Whistleblower Investigation Officer's ability to fully investigate the Disclosure.

8.3 Making a Disclosure through an Internal Reporting Channel

Personnel are encouraged to make Disclosures through an Internal Reporting Channel to enable the Disclosure to be addressed promptly. The Discloser is encouraged to complete and provide a Whistleblowing Form to:

- the Whistleblower Investigation Officer;
- the Whistleblower Protection Officer;
- an Officer or Senior Manager of NPBS;
- an internal auditor, or a member of an audit team conducting an audit of NPBS; or
- the actuary of NPBS.

8.4 Making a Disclosure through an External Reporting Channel

Where a Discloser does not feel comfortable making a Disclosure via an Internal Reporting Channel, they are encouraged to make their Disclosure to the KPMG FairCall Service.

The KPMG FairCall Service is a reporting service which is objective, confidential and independently monitored. It is designed to encourage Disclosers to make Disclosures without fear of Reprisal and with the support and protection of NPBS.

The FairCall Service will within 24 hours of receiving a Disclosure forward a FairCall Report to the Whistleblower Investigation Officer for investigation.

Prior to making a Disclosure to the KPMG FairCall Service, a Discloser should review the KPMG Privacy Statement Service at <https://www.kpmg.com/AU/faircallprivacy>

A Disclosure can be made to the KPMG FairCall Service via the following methods:

- **Phone**

A toll-free service which is monitored by trained and experienced KPMG professionals.

Phone number: 1800 500 965

Operating Hours: Business days between 7am – 6pm (EST)

Out of Hours: Personnel may leave a voicemail or choose to have their Disclosure received by KPMG South Africa. If a voicemail is left with sufficient details, KPMG will return the call upon resumption of the hotline's normal operating hours as set out above.

Disclosers will be provided with a confidential reference number by the operator.

- **Drop-box**

KPMG provides an internet 'drop-box' facility which enables Disclosures to be made anonymously. The drop-box link is <http://faircall.kpmg.com.au>.

- **Email Access**

Disclosures can be made via the email address faircall@kpmg.com.au.

- **Mailing Service**

Disclosures can be made to a secure mailbox at the following address:

The *FairCall* Manager
KPMG Forensic
PO Box H67
Australia Square
Sydney NSW 1213

- **Fax Service**

Disclosures can be made to a secure fax number monitored by KPMG on the following number:

Fax number: +61 2 9335 7466

8.5 Legal Practitioners

Information may also be disclosed to a legal practitioner for the purpose of obtaining legal advice and representation relating to the operation of the operation of, and protections available under, the Corporations Act or the Taxation Administration Act (including in relation to Personal Work Related Grievances). Such disclosures of information to a legal practitioner will attract the same protections as given to a Disclosure under this Policy, including in relation to Reprisal.

8.6 Public Interest and Emergency Disclosures

A Discloser can also make a Public Interest Disclosure or an Emergency Disclosure where the specific requirements to make such Disclosures are met.

Where a Discloser wishes to make a Public Interest Disclosure or an Emergency Disclosure, contact should first be made with the Whistleblower Protection Officer to provide required notification.

NPBS also recommends the Discloser seek independent legal advice regarding the criteria for making such a Public Interest Disclosure or an Emergency Disclosure and the protections that may apply.

9. Investigations

Once a Disclosure is made, the Whistleblower Investigation Officer must be notified. The Whistleblower Investigation Officer will:

- make an assessment to determine whether it falls within the scope of the Policy;
- determine whether an investigation is required and, if so, investigate the Disclosure; and

- consult with the Whistleblower Protection Officer regarding the identification and implementation of measures to prevent Reprisal in accordance with legal obligations.

Investigations will be conducted in a timely, fair and confidential manner, and involve the location and assessment of evidence (both documentary and oral) relevant to the Disclosure.

The Whistleblower Investigation Officer will act impartially and follow best practice in their investigations. The investigation will be conducted without bias and the person against whom any allegation is made will be given the right to respond. Appropriate records and documentation for each step in the investigation process will be maintained

Where practicable, the Whistleblower Investigation Officer will be independent of the Discloser and any person who is the subject of the Disclosure.

As a general principal, both the Discloser and any person who is the subject of the Disclosure will not be permitted to conduct or assist in conducting the investigation (other than by participating in the investigation process by answering questions or providing evidence), management or determination of the matters arising from the investigation.

The Whistleblowing Procedures Manual contains further information on the Investigation process, for use by Internal Audit Staff involved in an investigation, or a Whistleblower Investigation Officer appointed by the Company Secretary or CEO in accordance with this Policy.

9.1 Keeping the Discloser Informed

The Whistleblower Investigation Officer will inform the Discloser (if they have provided their contact details) of NPBS' receipt of a Disclosure within 7 working days of NPBS being made aware of the Disclosure.

To provide assurance to the Discloser that their Disclosure is being taken seriously, updates will be provided throughout the investigation process.

The Whistleblower Investigation Officer will ensure the Discloser, subject to any confidentiality, privacy or other legal considerations, is:

- informed when the investigation process has begun;
- updated to the progress of the investigation, at least every 28 days; and
- informed when the investigation has concluded.

Updates to the investigation will be provided orally or in writing, as appropriate, and in accordance with any preferred method of contact the Discloser has nominated.

If the Discloser is not an Officer or employee of NPBS, then communication will only be provided once the person has agreed in writing to maintain confidentiality in relation to any information provided to him or her in relation to the Disclosure made by him or her.

9.2 Outcomes of Investigations

At the conclusion of an investigation, the Whistleblower Investigation Officer will provide a confidential written report, containing findings and, where appropriate, recommendations to the Decision-maker.

After considering the report, the Decision-maker will:

- confirm he or she is satisfied all verifiable Disclosable Matters have been investigated;
- make a final determination in writing;
- where permitted by law, ensure the Discloser, Whistleblower Investigation Officer, Whistleblower Protection Officer and any person who is subject to the Disclosure is informed that a determination has been made;
- inform the CEO of the Disclosure and determination; and
- record the details of the Disclosure in the appropriate register.

If a Discloser is not satisfied with the outcome of an investigation, contact can be made with Head of Compliance to request a review. However, the Head of Compliance is not obliged to reopen an investigation and can conclude a review if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation.

A Discloser may also lodge a complaint with a regulator, such as ASIC or APRA, if they are not satisfied.

9.3 Discloser Involved in Disclosable Matters

NPBS acknowledges that the act of making a Disclosure in line with the requirements of this Policy will protect the Discloser from Reprisal for making the Disclosure but will not shield a Discloser from the appropriate consequences flowing from their involvement in any improper or illegal conduct.

The Decision-maker will make the final decision, in consultation with the Whistleblower Investigation Officer as to whether disciplinary or other action will be initiated in respect of the Discloser's involvement any improper or illegal conduct or false disclosure (refer section 12.6).

The Whistleblower Investigation Officer will thoroughly document the process including recording the reasons why the disciplinary or other action is proposed, and the reasons why the action is not a Reprisal.

10. Support

10.1 Employees

NPBS offers all employees access to the Employee Assistance Program (EAP), a nationwide provider who offers a range of confidential support services and counselling. Further information about EAP is available on NPBS' intranet, Fetch. In appropriate circumstances, as determined by the Whistleblower Protection Officer, NPBS may facilitate access to other appropriate support services.

10.2 Disclosers

NPBS recognises that Disclosers may require support during the investigation of the Disclosure. In appropriate circumstances, as determined by the Whistleblower Protection Officer, NPBS may facilitate access to the EAP or other appropriate support services to a Discloser who is not a current employee of NPBS.

10.3 Persons against whom a Disclosure has been made

NPBS recognises that Personnel against whom a Disclosure is made must also be supported during the investigation of the Disclosure. In appropriate circumstances, as determined by the

Whistleblower Protection Officer, NPBS may facilitate access to the EAP or other appropriate support services. NPBS will take steps to ensure the confidentiality of the person who is the subject of the Disclosure during the assessment and investigation process.

Where the investigation does not substantiate the Disclosure, the fact that the investigation has been carried out, the findings of the investigation, and the identity of the person who is the subject of the Disclosure will remain, so far as practicable, confidential.

The Whistleblower Investigation Officer will ensure procedural fairness is afforded to the person who is the subject of a Disclosure that is being investigated, including by informing them of the substance of the Disclosure, where permitted by law, and providing them with opportunity to respond during the course of the investigation.

The Decision-maker will ensure the person who is the subject of the Disclosure is formally advised when a determination is made.

11. Roles and Responsibilities

11.1 Personnel

Personnel are required to report known, suspected, or potential Disclosable Matters. NPBS encourages all Personnel to be vigilant, and report matters they feel will negatively impact NPBS.

Personnel have an important role to play in supporting those who have made a Disclosure. They must refrain from any activity that is, or could be perceived to be a Reprisal. Furthermore, they should protect and maintain the Confidential Information of a Discloser they know or suspect to have made a Disclosure, in accordance with this Policy.

It is important that Disclosers follow the process set out in this policy if making a Disclosure to ensure that they are afforded the protections available to them.

11.2 Eligible Recipient

In relation to a Disclosure received by an Eligible Recipient, the Eligible Recipient must promptly;

- notify the Whistleblower Investigation Officer;
- notify the Whistleblower Protection Officer;
- maintain confidentiality about the Disclosure and protect the Discloser's Confidential Information in accordance with this Policy;
- report any concerns in relation to any Reprisal to the Whistleblower Protection Officer.

11.3 KPMG

KPMG provides the FairCall Service to Disclosers for the purpose of making a Disclosure should the Discloser not wish to make a Disclosure via the Internal Reporting Channel. For each Disclosure made, KPMG will prepare a FairCall Report and provide it to NPBS for investigation.

When a Disclosure is made, KPMG will not ask for or record the Discloser's Confidential Information, unless the Discloser expresses that they do require their Confidential Information to be retained by KPMG or forwarded to NPBS.

11.4 Chief People and Culture Officer

At any time, NPBS employees may seek advice from the Chief People and Culture Officer in relation to the following:

- how the Whistleblower Protection Policy works;
- what the Policy covers; and
- how a Disclosure might be handled.

11.5 Whistleblower Protection Officer

The Whistleblower Protection Officer has responsibility for protecting the interests of Disclosers in accordance with NPBS' policies, procedures and applicable legal and regulatory obligations. The Whistleblower Protection Officer will usually be the Chief People and Culture Officer, except where the Disclosure relates to the Chief People and Culture Officer, the CEO or a Director, in which case, the Whistleblower Protection Officer will be appointed by the Company Secretary.

If a Disclosure relates specifically to NPCF or NFS the Whistleblower Protection Officer will be appointed by the Company Secretary of that entity.

It is the Whistleblower Protection Officer's responsibility to identify and implement appropriate support and measures to prevent Reprisal in accordance with legal obligations.

The Whistleblower Protection Officer will:

- assess the welfare and protection needs of the Discloser and implement appropriate actions;
- assess the risks of, and respond to any concerns of, Reprisal;
- ensure follow up communication is adequate; and
- upon conclusion of the investigation, prepare a report for the Decision-maker.

If a person is dissatisfied with the procedure followed by the Whistleblower Protection Officer, it should be reported in writing to the Decision-maker.

The Whistleblower Protection Officer:

- will be a separate person to the Whistleblower Investigation Officer; and
- may be an external appointment independent of NPBS.

11.6 Whistleblower Investigation Officer

The Whistleblower Investigation Officer has responsibility for conducting an investigation into the substance of a Disclosure. The Whistleblower Protection Officer is also responsible for explaining to the Discloser the measures that will be put in place to protect the Discloser's Confidential Information.

The Whistleblower Investigation Officer will usually be the Head of Internal Audit or a member of the Internal Audit team, except where the Disclosure relates to:

- the Head of Internal Audit or Internal Audit function, in which case the Whistleblower Investigation Officer will be appointed by the Company Secretary;
- an executive or director of NPBS in which case the Whistleblower Investigation Officer will be appointed by the Company Secretary; or

- the Company Secretary, in which case the Whistleblowing Investigation Officer will be appointed by the CEO.

If a Disclosure relates specifically to NPCF or NFS the Whistleblower Investigation Officer will be appointed by the Company Secretary of that entity.

The Whistleblower Investigation Officer will maintain a log of all Disclosures and report all new Disclosures to the Head of Compliance. At the conclusion of the investigation, the Whistleblower Investigation Officer will prepare a written report for the Decision-maker which details their findings and outcome of the investigation and, where appropriate, recommendations.

If a person is dissatisfied with the procedure followed by the Whistleblower Investigation Officer should be reported in writing to the Decision-maker.

The Whistleblower Investigation Officer:

- will be a separate person to the Whistleblower Protection Officer; and
- may be an external appointment independent of NPBS.

11.7 Decision-maker

The Decision-maker will be the Head of Compliance, except where the Disclosure relates to:

- the Head of Compliance, in which case the Decision-maker will be the Chief Risk Officer;
- an executive (other than the CEO, Head of Internal Audit or Company Secretary & General Counsel) in which case the Decision-maker will be the CEO; or
- the CEO, Head of Internal Audit or Company Secretary & General Counsel, in which case the Decision-maker will be the Chair of the NPBS Board.

If a Disclosure relates specifically to NPCF or NFS the Decision-maker will be appointed by the Board of that entity.

The Head of Compliance or, if the Disclosure relates to the Head of Compliance, the Company Secretary of the entity that is the subject of the Disclosure is responsible for notifying the Audit Committee or Board of that entity at the next Meeting. However, if a Disclosure is considered particularly serious the relevant Audit Committee or Board may be notified via email between Meetings.

The Head of Compliance or, if the Disclosure relates to the Head of Compliance, the Company Secretary of the entity that is the subject of the Disclosure will also be responsible for notifying, if applicable, the CEO of the Disclosure.

At the conclusion of the investigation, the Decision-maker will determine the actions, if any, to be taken as a result of the investigation. This determination will be based upon the reports provided by the Whistleblower Investigation Officer and the Whistleblower Protection Officer and any other relevant information provided to the Decision-maker for consideration.

Once a determination is made the Decision-maker will ensure the Discloser, the Whistleblower Investigation Officer, the Whistleblower Protection Officer and any person who is subject to the Disclosure that a determination has been made. The Decision-maker is also responsible for informing the CEO of the outcome.

The Head of Compliance will maintain a log of all finalised Whistleblowing Investigations and report the details and findings to the Audit Committee at the end of each quarter.

Any such notifications made to in accordance with this Policy will protect the Confidential Information of the Discloser.

12. Additional Information

Information from ASIC or APRA about making Disclosures can be found at:

- [How ASIC handles whistleblower reports](#) (ASIC)
- [Becoming a Whistleblower and making a public interest disclosure](#) (APRA)

13. Access and Training

This Policy will be made available on NPBS' public website and accessible via the internal document management system for all NPBS Officers and employees.

Training for all Officers and employees will occur at induction, and on an annual basis and be relevant to their role.

14. Review Process

This Policy will be reviewed annually by management, with the results of the review reported to the Audit Committee. Where management proposes changes to the Policy, these will be assessed by the Audit Committee and if considered appropriate will be recommended to the Board for approval. Changes to this Policy become effective once they are approved by Board resolution.

15. Related Policies and Procedures

This Policy is to be read in conjunction with the Fraud and Corruption Control Policy, Fit & Proper Policy, Responsible Manager Policy and the Code of Conduct.

16. Responsibility

Chief Risk Officer

17. Policy Owner

Board of Directors