

POL 3005.16 Whistleblower Policy

Version:	2.0
Effective Date:	18 December 2019
Administered by:	Executive Manager Risk and Compliance
Reviewed by:	Executive Management Committee and Board Risk Committee
Approved by:	Board

Reference

POL 3005.39 Code of Ethics
POL 3005.08 Work Health, Safety and Welfare
POL 3002.14 Information Security Policy
POL 3005.32 Management of Incidents Policy;
POL 3005.21 Compliance Policy;
POL 1425 Counselling & Disciplinary Policy; and
POL 1427 Workplace Issue Resolution Policy
Corporations Act 2001 (as amended by the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019)
ASIC Information Sheet 52 – Guidance for Whistleblowers (INFO 52)
Information Sheet 238 Whistleblower rights and protections
Information Sheet 239 How ASIC handles whistleblower reports
CPS 510 Governance
CPS 520 Fit and Proper
INF 3005.16 Whistleblower Disclosure Investigation Process

Definitions

Eligible Recipient - Disclosures by a Whistleblower will be protected when the disclosures are made to:

- a director, company secretary, other officer, actuary or senior manager of PCU;
- PCU's auditor or a member of PCU's audit team or of any related body corporate;
- a person authorised by PCU to receive Whistleblower Disclosures;
- a legal practitioner for the purposes of seeking legal advice;
- APRA (refer to APRA Information on whistleblowing); or
- ASIC (refer to ASIC Information Sheet 239).

Eligible Whistleblower – An individual is an Eligible Whistleblower (“Whistleblower”) and can take advantage of the protections set out in this policy, if they are:

- a Relevant Person;
- make a Protected Disclosure; and
- that disclosure is made to a person who is an Eligible Recipient.

Protected Disclosure (“Disclosure”) - A disclosure is protected under this policy, if the Whistleblower has reasonable grounds to suspect that the information disclosed concerns misconduct, or an improper state of affairs or circumstances in relation to PCU or a related body corporate of PCU. The term ‘reasonable grounds to suspect’ is based on the objective reasonableness of the reasons for suspicion.

Relevant Person - anyone who is, or has been, employed by or works, or has worked, at PCU, including:

- officers (managers and directors);
- employees who are [permanent, part-time, fixed-term or temporary, interns, secondees];
- individuals who supply goods to PCU (on a paid or unpaid basis) or employees of a supplier;
- associates of PCU; and
- relatives or dependents of any of the former individuals.

Background

Police Credit Union (PCU) is committed to a high standard of integrity, ethical conduct and transparency in all of its activities and interactions as well as the implementation of an effective whistleblower policy that supports these principles, whilst adhering to its obligations as a regulated entity under the *Corporations Act 2001* and the whistleblower provisions thereunder. As an authorised deposit-taking institution regulated by APRA prudential standards, PCU is also required to have in place appropriate governance and risk management.

This Whistleblower Policy, therefore, forms part of PCU's broader Risk Management Framework and is supported by POL 3005.39 Code of Ethics. An effective whistleblower protection framework is essential to the Risk Management Framework and culture of PCU and promotes a positive, proactive and transparent culture where individuals are encouraged to "speak up".

This policy establishes a mechanism within PCU in which individuals can safely raise concerns and challenge any misconduct and improper practices.

Whistleblower Protection Framework

PCU's framework for protecting whistleblowers includes a number of important factors. In particular:

- this policy;
- positions tasked with handling and overseeing aspects of the Whistleblower Protection Framework;
- a transparent process for dealing with Whistleblower Disclosures;
- processes, procedures and systems to support the ongoing operation of the Whistleblower Protection Framework;
- training; and
- governance arrangements including internal reporting.

Policy

	Assigned Officer	Frequency	Attestation
PCU will at all times have in place a whistleblower framework that adheres to, both, all legislative and prudential obligations and POL3005.39 Code of Ethics.	All	Ongoing	Yes

Key Whistleblower Roles

Whistleblower Protection Officer

The role of the Whistleblower Protection Officer is to:

- be the person to whom a Relevant Person may make a Whistleblower Disclosure;
- maintain the confidentiality and anonymity of the Whistleblower;
- protect the Whistleblower from adverse repercussions and detriment;
- keep in regular contact with the Whistleblower;
- provide updates and any findings of the investigation to the Whistleblower;
- review and consider any complaints made by the Whistleblower regarding the investigation or any adverse repercussions or detriment suffered as a result of their Whistleblower Disclosure under this policy; and
- escalate any matter the Whistleblower Protection Officer considers appropriate.

Whistleblower Investigations Officer

The Whistleblower Investigations Officer conducts the investigation into the Whistleblower Disclosure.

Whistleblower Executive Champion

PCU has appointed a Whistleblower Executive Champion whose role is to oversee the overall effectiveness of the Whistleblower Protection Framework and ensure it delivers on the objectives outlined in this policy. Through this oversight, PCU seeks to ensure that the effectiveness of the Whistleblower Protection Framework is monitored (including as appropriate by independent assessments) and actions are taken to embed improvements where appropriate. The Whistleblower Executive Champion is also tasked with responding to any complaints or escalations relating to breaches or potential breaches of this policy.

	Assigned Officer	Frequency	Attestation
<p>PCU will ensure that appropriate individuals have been appointed to the key whistleblower roles, as noted below, and that each individual undertakes their responsibilities.</p> <p><i>Whistleblower Protection Officer</i> PCU has appointed Ben Willington, Senior Director – Audit and Assurance, Accru Harris Orchard as the Whistleblower Protection Officer. Luke Bollmeyer, also of Accru, has been appointed as the Whistleblower Protection Officer in the event of Ben’s absence.</p>	Board	Ongoing	Yes
<p><i>Whistleblower Investigations Officer</i> PCU has appointed the Executive Manager Risk and Compliance as the Whistleblower Investigations Officer. From time to time, PCU may use an independent third party to investigate due to the nature or complexity of the matter raised in the Whistleblower Disclosure.</p> <p>In any case, the Whistleblower Investigations Officer will maintain the independence, confidentiality and anonymity of the Whistleblower. They will conduct the investigation in a timely, fair and impartial manner.</p>	EMR&C	Ongoing	Yes
<p><i>Whistleblower Executive Champion</i> PCU has appointed the Chief Executive Officer, or their delegate, as the Whistleblower Executive Champion.</p> <p>The Whistleblower Executive Champion will monitor the overall effectiveness of the Whistleblower Protection Framework and ensure it delivers on the objectives outlined in this policy.</p> <p>The Whistleblower Executive Champion will action any complaints or escalations relating to breaches or potential breaches of this policy, ensuring appropriate remedial action is taken where required.</p>	CEO	Ongoing	Yes

Whistleblower Process

Making a Disclosure

PCU encourages all individuals to raise concerns so that it can identify and address wrongdoing as early as possible. If the individual feels comfortable raising concerns within the usual business environment or with their direct manager, they should do so.

Alternatively, if this is not possible or the individual considers it more appropriate in the circumstances to report the matter as a whistleblower, PCU has implemented reporting channels that an individual can use. An individual should choose an option which suits the individual’s circumstances and level of comfort.

It should be remembered that Protected Disclosures relate to misconduct or an improper state of affairs or circumstances and that the Whistleblower must have reasonable grounds to suspect this has or is occurring.

While it is not the responsibility of a Whistleblower to prove the allegations which are the subject of a disclosure, a mere allegation with no supporting information is unlikely to be considered as having ‘reasonable grounds to suspect’. It is also important to ensure the information reported is, to the best of Whistleblower’s knowledge, true. Deliberate false reporting of information which a person knows to be untrue will not be protected under this policy and is likely to amount to a breach of PCU’s Code of Conduct. Deliberate false reporting could have serious consequences for the reputation of PCU and the person involved in the disclosure. For the purposes of clarity, reporting of false information does not include circumstances where a Whistleblower has reported information in good faith and which they believe to be true, but which is later determined to be unfounded as a result of an investigation performed by PCU.

Examples of the types of disclosures which are protected under this policy include information regarding engagement in:

- dishonest behaviour;
- fraudulent activity, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- unlawful, corrupt or irregular use of PCU's funds;
- illegal behaviour (including conduct not directly related to PCU's affairs, such as theft, illicit drugs, violence or property damage);
- contravention of legislation or an offence under any law;
- conduct that represents a danger to the public or the financial system; or
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.

Disclosable matters includes conduct that, although lawful, may be considered to be unethical, capable of causing harm, prohibited by PCU's Code of Ethics Policy or systemic in nature.

Personal work-related grievances of a Relevant Person generally are not covered by this policy but are instead managed under POL 1427 Workplace Issue Resolution Policy. Personal work-related grievances include, but are not limited to, interpersonal conflicts, decisions relating to the engagement, transfer or promotion of the Relevant Person, decisions relating to the terms and conditions of engagement of the Relevant Person or a decision to discipline the Relevant Person.

However, a personal work-related grievance may qualify for protection under this policy where the grievance:

- includes information about misconduct (i.e. it is a mixed report);
- relates to a breach of employment or other laws punishable by imprisonment for a period of 12 months or more, relates to conduct that represents a danger to the public or relates to information that suggests misconduct beyond the discloser's own personal circumstances (i.e. the conduct is believed to be a systemic issue relating to PCU's culture);
- detriment suffered or threatened against a person in connection with a disclosure; or
- the discloser has obtained legal advice or legal representation about the operation of whistleblower protections and has been advised that the matter is a protected disclosure.

Protections are also provided in the tax whistleblower regime under the Taxation Administration Act 1953.

If a person is unsure whether a particular matter falls within this policy, they can seek further guidance from the Whistleblower Protection Officer or their own independent legal advice.

Disclosures to the Whistleblower Protection Officer can be made to:

Ben Willington, Accru Harris Orchard or *Luke Bollmeyer, Accru Harris Orchard*

(W) 8431 1488

(W) 8431 1488

(M) 0402 121 509

(M) 0411 714 770

Email: bwillington@accruadel.com.au

Email: lbollmeyer@accruadel.com.au

When submitting a Whistleblower Disclosure in writing or by email, please ensure the subject line is marked with 'Confidential – Whistleblower Disclosure' or advise the Whistleblower Protection Officer this is the purpose if reporting verbally.

In addition, Whistleblowing legislation currently permits disclosures by an Eligible Whistleblower to ASIC and APRA:

ASIC - <https://asic.gov.au> (See also ASIC Information Sheet 239)

APRA - <https://www.apra.gov.au/>

As noted above, all Disclosures made under this policy are confidential. If an individual would like to report the matter anonymously, they should choose the appropriate channel which best suits their circumstances in order to protect their identity.

A Whistleblower can choose a pseudonym for the purposes of a disclosure and not use their actual name. A Whistleblower may also refuse to answer questions, if they feel that by answering the questions their true identity could be revealed. However, a Whistleblower is encouraged to continue to maintain communications with PCU as far as possible so follow up questions and feedback can be provided.

Making a Public Interest Disclosure

While PCU encourages internal disclosure and investigation of issues at all times, a Whistleblower may be of the view that appropriate action is not being taken to address the matter. In these circumstances, a public interest disclosure may be made to an external third party but the view must be formed on reasonable grounds.

Protection under the law for a public interest disclosure will be available where:

- the Whistleblower has previously made a disclosure through one of PCU's reporting channels (original disclosure);
- 90 days have passed since the original disclosure was made;
- the Whistleblower does not have reasonable grounds to believe that action is being, or has been, taken to address the matter set out in the original disclosure; and
- the Whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest;
- after the 90 day period, the Whistleblower gave PCU or other body to which the original disclosure was made, written notification that included sufficient information to identify the original disclosure together with the Whistleblower's stated intention to make a public interest disclosure;
- the public interest disclosure is made to either a member of the Parliament of the Commonwealth, State or Territory or a journalist; and
- the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the recipient of the misconduct or improper state of affairs or circumstances referred to in the original disclosure.

Whistleblowers can also contact the Whistleblower Protection Officer or an independent legal adviser for further guidance on making a public interest disclosure if needed.

Making an Emergency Disclosure

While the Company encourages internal disclosure and investigation of issues at all times, a Whistleblower may be of the view appropriate action is not being taken by PCU to address the matter and the matter poses **substantial and imminent danger to the health or safety of one or more persons or to the natural environment**. In these situations, an emergency disclosure may be made to an external third party. Protection under the law for emergency disclosures will be available where:

- the Whistleblower has previously made a disclosure through one of PCU's reporting channels (original disclosure);
- the Whistleblower has reasonable grounds to believe that the information concerns substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- the Whistleblower gave PCU or other body to which the original disclosure was made, written notification that included sufficient information to identify the original disclosure together with the Whistleblower's stated intention to make an emergency disclosure;
- the public interest disclosure is made to either a member of the Parliament of the Commonwealth, State or Territory or a journalist; 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.

Whistleblowers can also contact the Whistleblower Protection Officer or an independent legal adviser for further guidance on making an emergency disclosure if needed.

Making Reports to Other Bodies

There are some circumstances in which a Whistleblower may have an additional legal obligation to report the information disclosed to a statutory body or government department as well. In these circumstances, the Whistleblower Protection

Officer will advise the Whistleblower of such obligations, and the Whistleblower should make sure that these obligations are complied with.

Investigation Process

Generally, an investigation of a disclosure by a Whistleblower will consist of the following stages:

1. Initial Assessment
2. Formal Investigation
3. Report on Outcomes

The stages and timeframes may vary depending on the nature of the disclosure. For example, if the disclosure involves a complex matter or a large number of people, the investigation process may be conducted over a longer period of time. The Whistleblower Protection Officer will communicate with the Whistleblower throughout the investigation process as per the following section.

Assessment of disclosures and, if applicable, investigation of a disclosure will be treated in a thorough, objective, fair and impartial manner by PCU and the persons involved in the investigation. In particular, some of the actions taken to ensure this occurs include:

- as far as practicable, confidential handling of the disclosure and the identity of the Whistleblower and any persons involved in or related to the disclosure;
- all disclosures made under this Policy will at a minimum be subject to an initial assessment;
- the primary objective of an investigation will be to determine whether there is enough evidence to substantiate or refute the matters reported; and
- an employee/employees who are the subject of a disclosure will be informed about the subject matter of the disclosure, treated in accordance with applicable employment laws and principles of natural justice and procedural fairness and advised of the outcome in due course.

Refer to INF 3005.16 Whistleblower Disclosure Investigation Process for further detail on the investigation process.

Communications with a Whistleblower

Generally, all communications with a Whistleblower will be undertaken by the Whistleblower Protection Officer to ensure that the Whistleblower remains anonymous and to safeguard the independence and integrity of an investigation.

The Whistleblower Protection Officer will contact the Whistleblower to acknowledge receipt of the disclosure and to establish a process, including expected timeframes, for reporting to the Whistleblower on the progress of dealing with the disclosure. In addition, the Whistleblower will also be informed of the appointment of a Whistleblower Investigations Officer.

All relevant information regarding an investigation will be provided to the Whistleblower Protection Officer by the Whistleblower Investigations Officer so that the Whistleblower Protection Officer can keep the Whistleblower apprised of the progress.

Where it is determined that there is insufficient information to warrant a formal investigation, the Whistleblower Protection Officer will inform the Whistleblower as soon as practicable.

Upon determination of the final outcome of an investigation, the Whistleblower will be contacted by the Whistleblower Protection Officer and provided with appropriate details regarding the outcome.

	Assigned Officer	Frequency	Attestation
<p>Employees should raise any concerns within the usual business environment or with their direct manager, where they feel comfortable, and that it is appropriate, to do so.</p> <p>Alternatively, if this is not possible or the individual considers it more appropriate in the circumstances to report the matter as a whistleblower. In these circumstances, a Relevant Person must only report Protected Disclosures to Eligible Recipients.</p>	All Employees	Ongoing	Yes

<p>PCU and the Whistleblower Protection Officer will not consider the disclosure protected if there are no reasonable grounds to suspect misconduct or an improper state of affairs or circumstances in relation to PCU.</p> <p>PCU will also not consider personal work-related grievances as a Protected Disclosure except in some circumstances (refer above). Personal work-related grievances will instead typically be managed in accordance with POL 1427 Workplace Issue Resolution Policy.</p> <p>PCU will treat all Whistleblower Disclosures as confidential, however, disclosures may still be made anonymously.</p> <p>The Whistleblower Protection Officer will provide guidance to Relevant Persons, as requested, on making public interest or emergency disclosures and advice as to whether these disclosures also require the Relevant Person to report to any other bodies, such as government departments.</p> <p>The Whistleblower Protection Officer will communicate with the Whistleblower throughout the investigation of the Disclosure, which will be conducted in a manner ensuring confidentiality, fairness and impartiality, and in accordance with INF 3005.16 Whistleblower Disclosure Investigation Process.</p>	WPO	As required	Yes
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Protection and Support for Whistleblowers

PCU is required to take steps to ensure fair treatment for all Whistleblowers that qualify for protection including:

- maintenance of the Whistleblower’s confidentiality; and
- protection from suffering detriment.

It is the role of the Whistleblower Protection Officer to ensure that the Whistleblower is properly afforded these protections. The Whistleblower will be contacted by the Whistleblower Protection Officer, as soon as practicable after making a disclosure, to discuss their welfare (as appropriate).

In addition to the above protections which must be implemented by PCU, a Whistleblower may also be entitled to other protections at law including:

- compensation and remedies for loss, damage or injury suffered by a Whistleblower because of a disclosure or where the PCU has failed to prevent a person from causing detriment; and
- civil (e.g. for breach of employment contract), criminal (e.g. for unlawfully releasing information) and administrative liability protection.

The above protections at law do not grant immunity for any misconduct a Whistleblower themselves has engaged in which may be revealed in their disclosure or any fraudulent or false disclosure. A Whistleblower should seek independent legal advice if they require further advice or guidance on the protections available to them.

Steps taken to ensure Whistleblower confidentiality

PCU must take all reasonable steps to protect the confidentiality of a Whistleblower. In particular, the identity and information that can lead to the identification of a Whistleblower will be safeguarded so that they can remain anonymous (if preferred) or strictly confidential. The identity, or information that could lead to the identification of the Whistleblower, will only be disclosed to other officers or employees of the PCU on a “needs to know” basis where necessary to investigate the issues raised in the disclosure and subject to strict confidentiality requirements. The Whistleblower’s identity will also not be disclosed in Court or Tribunal proceedings, unless compelled or necessitated by law.

Steps taken to protect a Whistleblower from detriment

It is an offence under the whistleblower legislation for a person to cause detriment, or threaten to cause detriment, to a person who has made a disclosure as a Whistleblower or someone whom they suspect may make a disclosure. A threat

can be express or implied, conditional or unconditional. The types of detriment which are covered by this prohibition include:

- termination of employment;
- performance management or disadvantageous alteration of duties;
- discrimination between the Whistleblower and other employees of the company;
- any harm or injury, including any psychological harm;
- damage to property or reputation;
- damage to a business or financial position;
- harassment or intimidation; or
- any other damage to a person.

PCU takes very seriously any adverse actions against, or threats to, Whistleblowers. However, actions taken by PCU (such as administrative action or management) which are reasonable to protect the Whistleblower or other persons, is not detrimental conduct.

PCU will take reasonable precautions and steps to protect people who have or intend to make a disclosure under this policy from detriment by:

- making this policy easily accessible;
- appointing independent and impartial persons to perform duties in connection with this policy including the Whistleblower Protection Officer, the Whistleblower Investigations Officer and the Whistleblower Executive Champion;
- taking appropriate action to protect the Whistleblower from the risk of detriment in accordance with any assessed risks (for example, re-location of the Whistleblower to another office or role at the same level, reassigning or relocating other staff involved in the disclosable matter or other modifications to the Whistleblower's workplace or the way they perform their duties);
- maintaining the confidentiality of the Whistleblower's identity and information that could lead to the identification of the Whistleblower;
- implementing a secure record keeping system to hold information, documentation and communications relating to a Whistleblower Disclosure; and
- conducting training and awareness communications outlining (i) the importance of whistleblowing, (ii) PCU's support of those individuals who decide to make a Whistleblower Disclosure and (iii) the consequences for breaching this policy to all staff but in particular management; and
- PCU's Employment Assistance Program through Access Programs.

If a Whistleblower has suffered any detriment, they should report this to the Whistleblower Protection Officer as soon as possible. The Whistleblower Protection Officer will arrange for PCU to provide all reasonable assistance and protection to prevent the Whistleblower from suffering any further detriment. Some of the actions which may be considered appropriate include but are not limited to:

- allowing the discloser to take extended leave;
- developing an alternative career development plan; or
- offering other support or remedies such as counselling, advice or financial support.

What support is provided to Whistleblowers

A Whistleblower who is a current or former employee of PCU, is able to access the company's confidential counselling service below:

Access Programs
1300 66 77 00

A Whistleblower may also request additional independent support by contacting the Whistleblower Protection Officer.

How are complaints from Whistleblowers dealt with

If a Whistleblower has any complaints or concerns about the manner in which the investigation is being handled, they can raise their concerns with the Whistleblower Protection Officer. The Whistleblower Protection Officer may escalate the

complaint or concern to the Whistleblower Executive Champion. Where the complaint or concern is regarding the Whistleblower Protection Officer, the Whistleblower may address their complaints or concerns directly to the Whistleblower Executive Champion.

<p>PCU will ensure fair treatment for all Whistleblowers including by:</p> <ul style="list-style-type: none"> - maintaining Whistleblower confidentiality; and - protecting Whistleblowers from detriment. 	All	Ongoing	Yes
<p>The Whistleblower Protection Officer will ensure that the Whistleblower is properly afforded these protections. The Whistleblower Protection Officer will contact the Whistleblower, as soon as practicable after making a disclosure, to discuss their welfare (as appropriate).</p>	WPO	Ongoing	Yes
<p>PCU will take all reasonable steps to protect the confidentiality of a Whistleblower. In particular, the identity and information that can lead to the identification of a Whistleblower will be safeguarded so that they can remain anonymous (if preferred) or strictly confidential.</p>	All	Ongoing	Yes
<p>The Whistleblower Protection Officer will not disclose the identity of the Whistleblower unless it is necessary to investigate the issues raised in the disclosure, or compelled by law, and will only do so under to strict confidentiality requirements.</p>	WPO	As required	Yes
<p>PCU protects a Whistleblower’s confidentiality by:</p> <ul style="list-style-type: none"> - securely storing paper, electronic documents and other materials relating to the disclosure; - restricting access to information relating to disclosure to only those persons necessary to undertake or assist with an investigation of the disclosure; - ensuring communications (including emails) with the Whistleblower or relating to a disclosure are sent to authorised addresses and/or staff; - limiting printing of documents relating to the disclosure to only where it is strictly required and ensuring that printed documentation can only be accessed by persons authorised under this policy; - ensuring that all parties involved in a disclosure are regularly reminded that they are required to keep the identity of the Whistleblower and the disclosure confidential. 	All	Ongoing	Yes
<p>PCU will ensure that no detriment, or threat to cause detriment, will be made to a person who has made a disclosure as a Whistleblower or to someone who is suspected has made, or may make, a disclosure.</p>			
<p>Any person who takes such action will be subject to potential civil and criminal liability in addition to PCU’s internal disciplinary process in accordance with POL 1425 Counselling & Disciplinary Policy.</p>			
<p>Where action is taken to protect the Whistleblower, the Whistleblower Protection Officer will explain the reasons why such action has been taken to the Whistleblower.</p>	WPO	As required	Yes
<p>PCU will protect people from detriment, including by:</p> <ul style="list-style-type: none"> - publishing this policy on MyPCU; 	All	Ongoing	Yes

<ul style="list-style-type: none"> - appointing appropriate persons to critical Whistleblower roles; - ensuring action is taken to protect the Whistleblower from detriment in accordance with the assessed risk; - protecting the Whistleblower's identity; - applying the protocols of POL3002.14 Information Security Policy to the retention of information, documentation and communications relating to a Whistleblower Disclosure; and - conducting training and awareness programs; and - providing access to the Employment Assistance Program. <p>In the event of a Whistleblower reporting detriment, the Whistleblower Protection Officer will arrange for PCU to provide all reasonable assistance and protection to prevent the Whistleblower from suffering any further detriment.</p> <p>The Whistleblower Protection Officer will also provide any further support if requested by a Whistleblower.</p> <p>The Whistleblower Protection Officer will also escalate any complaint or concerns to the Whistleblower Executive Champion.</p>	WPO	As required	Yes
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Breaches of this Policy

Breaches of this policy will be taken very seriously by PCU and will be managed in accordance with its standard policy and procedure.

In addition to PCU's disciplinary actions, PCU will also cooperate with legal bodies and an individual who is found not to have complied with this policy may be subject to civil or criminal liability for a breach of the Corporations Act 2001. In particular:

- if an individual is found to have engaged in conduct that caused a Whistleblower to suffer detriment, that individual may be liable for up to 30 penalty units, 6 months in prison, or both; and
- if an individual is found to have disclosed information breaching the Whistleblower's right to anonymity and confidentiality, the individual may be liable for 120 penalty units or imprisonment for 2 years, or both ; and

in addition, a court may also impose a further pecuniary fine on an individual of up to \$200,000.

<p>All breaches of this policy will be managed and reported in accordance with POL 3005.32 Management of Incidents Policy.</p>	EMR&C	As required	Yes
<p>An employee who does not comply with this policy will be subject to disciplinary action in accordance with POL 1425 Counselling and Disciplinary Policy and, potentially, POL 3005.15 Summary Dismissal Policy.</p>	CEO/HPC	As required	Yes

Record Keeping

It is a legislative requirement that the whistleblowing process is adequately evidenced by appropriate records and those records are securely maintained and, due to the sensitive nature of whistleblower matters, the records must be kept separate from day-to-day systems, strictly confidential and with restricted access. The storage location of records should be informed by general principles of legal professional privilege, confidentiality and security.

<p>PCU will ensure that all documentation in relation to any Whistleblower Disclosure are securely maintained, separate to other 'standard' records and information. The records will be retained in secure cabinets, accessible only by the Executive Manager Risk & Compliance and, upon request, by the CEO in their role as</p>	EMRC	Ongoing	Yes
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<p>Whistleblower Executive Champion, and the Whistleblower Protection Officer. Information security principles as required in POL 3002.14 Information Security Policy will also be applied.</p> <p>At a minimum, the following types of records will be maintained:</p> <ul style="list-style-type: none"> - the Whistleblower Disclosure; - the investigation report and related evidence, communications and records; - communications with the Whistleblower and any other stakeholders involved in the process; - internal/external reporting on the whistleblower matter. <p>All records relating to the whistleblowing process will be retained for a minimum of 7 years.</p> <p>The Whistleblower Protection Officer will ensure there is a clear process in place for secure record keeping and that all relevant parties involved in the process are properly informed of this process.</p>	WPO	Ongoing	Yes
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Roles and Responsibilities

There are numerous functions who play key roles in ensuring that this policy is in place, accurate, up to date and complete, that policy requirements are adhered to and that the protections afforded under PCU’s Whistleblower Framework are communicated to all eligible persons.

<p>The Board, Board Risk Committee and Executive Management Committee will:</p> <ul style="list-style-type: none"> - approve this Whistleblower Policy and any material amendments; - demonstrate a clear commitment to an open-door culture where issues or concerns can be raised without fear; - ensure effective implementation of this Whistleblower Policy; and - ensure that any recommended actions arising from a whistleblower investigation are reviewed and, where appropriate, implemented. 	Board / BRC/ Exec Mgrs	Ongoing	Yes
<p>The Whistleblower Protection Officer will:</p> <ul style="list-style-type: none"> - be the person to whom a disclosure by the Whistleblower may be made; - maintain the confidentiality and anonymity of the Whistleblower; - protect the Whistleblower from adverse repercussions and detriment; - keep in regular contact with the Whistleblower; - provide updates and any findings of the investigation to the Whistleblower; - review and consider any complaints made by the Whistleblower regarding the investigation or any adverse repercussions or detriment suffered as a result of their disclosure under this policy; - escalate any matter the Whistleblower Protection Officer considers appropriate; and - ensure that all records related to disclosures and investigations are retained for at least 7 years. 	WPO	Ongoing	Yes

<p>The Whistleblower Investigations Officer will:</p> <ul style="list-style-type: none"> - investigate all whistleblower matters referred to them by the Whistleblower Protection Officer in a timely, fair and impartial manner; and - provide a report setting out the findings of the investigation, including a summary of the allegations, evidence and a final determination. <p>Whistleblower Executive Champion:</p> <ul style="list-style-type: none"> - monitor the overall effectiveness of the Whistleblower Protection Framework; - respond to escalations from the Whistleblower Protection Officer or the Whistleblower Investigations Officer relating to breaches or potential breaches of this policy; - respond to complaints from Whistleblowers. 	EMRC	Ongoing	Yes
<p>Whistleblower Executive Champion:</p> <ul style="list-style-type: none"> - monitor the overall effectiveness of the Whistleblower Protection Framework; - respond to escalations from the Whistleblower Protection Officer or the Whistleblower Investigations Officer relating to breaches or potential breaches of this policy; - respond to complaints from Whistleblowers. 	CEO	Ongoing	Yes

Reporting

Breaches

Breaches of this policy should be reported in accordance with the policy and procedure for reporting any other breach. However, if there are concerns about the sensitivity of the breach, you can report it to any of the following persons:

- the Whistleblower Protection Officer;
- Whistleblower Investigations Officer (Executive Manager Risk and Compliance);
- Whistleblower Executive Champion (CEO); or
- the Head of People and Culture.

Ongoing Reporting

PCU is committed to monitoring the effectiveness of this Whistleblower Policy and ensuring compliance with its legal obligations. The effectiveness of this policy and compliance with legal obligations will be monitored through the provision of various reporting.

Breaches of this policy will be reported and managed in accordance with POL 3005.32 Management of Incidents Policy.	EMRC	As required	Yes
All persons to whom a breach is reported will ensure the matter is handled with confidentiality and in a timely, fair and impartial manner, affording the reporting person with the protections afforded by this policy.	WPO/EMR&C/ CEO/HPC	As required	Yes
The following reporting will be provided to ensure this policy is operating effectively:			
<ul style="list-style-type: none"> - <i>Whistleblower Investigation Summary</i>: Provided to the Board Risk Committee by the Whistleblower Protection Officer, reporting on the receipt, ongoing investigation and final outcome of whistleblower investigations (while maintaining the Whistleblower's confidentiality). 	WPO	As required	Yes
<ul style="list-style-type: none"> - <i>Periodic Reports</i>: Provided quarterly to the Board Risk Committee by the Whistleblower Protection Officer, reporting on the performance of the Whistleblower Protection Framework. 	WPO	Quarterly	Yes
<ul style="list-style-type: none"> - <i>Whistleblower Protection Updates</i>: Provided quarterly to the Whistleblower Executive Champion and Board Risk Committee by the Whistleblower Protection Officer, reporting on the performance of the Whistleblower Protection Framework including complaints, escalations 			

<p>breaches/ potential breaches of this policy, whistleblowing trends, insights into culture.</p> <ul style="list-style-type: none"> - <i>Whistleblower Protection Framework Review</i>: Annual review by the Whistleblower Protection Officer of the Whistleblower Protection Framework, taking into account whistleblowing trends, insights into culture and key learnings from investigations (while maintaining the Whistleblower's confidentiality). Provided to the Executive Management Committee and Board Risk Committee. 	WPO	Annually	Yes
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Accessibility and Training

PCU is committed to ensuring that all Relevant Persons have access to this policy and understand the types of reportable conduct, the whistleblowing process adopted by PCU and the protections afforded under this policy.

<p>PCU will ensure that this policy is readily accessible and that all employees are aware of its requirements and protections, including by:</p> <ul style="list-style-type: none"> - ensuring that the current version of the policy is available on MyPCU and also on request from the Risk & Compliance or People and Culture Departments; and - training is provided at induction for new employees and officers and in an ongoing manner as part of refresher training for existing employees. 	EMRC/HPC	Ongoing	Yes
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Annual Policy and Control Attestation

In completing this attestation and as the Responsible Officer for the implementation of this policy, I confirm that following reasonable enquiries and to the best of my knowledge, each listed policy requirement has been completed by the Assigned Officer. Any known material exceptions are provided in support of this attestation and have been reported to the Chief Executive Officer and the Chief Risk Officer.

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Executive Manager Risk and Compliance

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