

Whistleblower Reporting

Australia Post Group (the Group) has established a Whistleblower Hotline to enable workforce participants to make a disclosure of serious unethical, unlawful or wrongful conduct in accordance with the *Public Interest Disclosure Act 2013* (PID Act), the *Corporations Act 2001* (Cth) (Corporations Act), or the *Taxation Administration Act* 1953 (Cth) (Taxation Administration Act).

You can make a disclosure if you are a current or former Workforce Participant as follows:

- Employee of the Group;
- Contractor who provides goods or services to APG (whether paid or unpaid);
- Employee or subcontractor of a contractor who provides goods or services to the Group;
- Licensee of a Licensed Post Office of the Group;
- Employee of a Licensed Post Office of the Group;
- Officer or associate of the Group; or
- Relative or family member of any of the above;

and

- Your concern does not relate to a Customer Complaint;
- · Your concern does not relate to a personal work-related matter;
- You have reasonable grounds to suspect serious unethical, unlawful or wrongdoing conduct within the Group or by someone at or connected with the Group.

Customer Complaints

Customers who wish to make a complaint or have concerns about the Group's services should contact the Customer Contact Centre via post, email, phone on 13 76 78 or online via https://auspost.com.au/about-us/corporate-information/complaints-and-feedback#letter

The types of activity that does not meet the whistleblower criteria includes complaints regarding:

- The delivery of mail or parcels;
- The collection of mail or service received at an Australia Post facility; or
- The behaviour of Australia Post staff observed by customers or the general public ie. reporting driving offences.

Whilst it is the Group's preference that all customer complaints are made using the dedicated Customer Contact team channels, if any complaint is made through the Whistleblower communication channels, the complaint will be forwarded to the relevant team for action.

Personal work-related matters

Concerns that are about:

- A personal matter relating to a person's current or former employment with the Group;
- Inappropriate behaviour that relates to individuals personally such as discrimination, harassment or bullying (unless such actions are in retaliation for making a disclosure); or
- Other non-serious and non-systemic issues of misconduct that do not have broader implications for the Group,

should be reported under the relevant policy where it can be more appropriately managed.

- For harassment, discrimination or bullying concerns that relate to individuals personally, contact the HDB Hotline at HDBMatters@auspost.com.au or call 1800 641 535;
- For other personal work-related matters, refer to your HR representative or people leader.

However, as with customer complaints, if we receive matters about personal work-related concerns via our Whistleblower communication channels, we will refer it to the relevant group within APG to manage.

What is a protected disclosure?

A disclosure may be protected as a public interested disclosure or whistleblower disclosure if a Workforce Participant, or a public official of another agency, reasonably suspects serious wrongdoing, misconduct or an improper state of affairs or circumstances. This includes:

- Conduct or practices that may breach an Australian or foreign law, regulation or code (such as theft, drug sale or use, criminal damage etc.);
- Corrupt or fraudulent conduct (such as misappropriation of funds, bribery, undue influence, false or misleading information etc.);
- Maladministration or a substantial mismanagement or wastage of Australia Post's resources (such as excess
 private use of work provided phone, unauthorised use of fuel cards for private vehicles, using the Group's
 resources/information for personal gain etc.);
- · Conduct involving substantial risk to health or safety or significant danger to the environment or to the public;
- Conduct involving potential breaches of human rights standards;
- Conduct that may cause serious financial or non-financial loss to the Group or damage to its reputation and brand, or that may otherwise cause danger to the financial system; or
- A serious breach of Our Ethics.

How to Make a Whistleblower Disclosure

If you are a current or former Workforce Participant of Australia Post Group, or a public official of another agency, wanting to report suspected serious wrongdoing, misconduct or an improper state of affairs or circumstances, a disclosure can be made via the **Whistleblower Hotline** on **1800 799 353 (Australia)** or **+61 3 8603 5364 (overseas)**.

The Whistleblower Hotline is managed by an external provider, who will direct your concerns to an Australia Post Group Authorised Officer.

Provided that your disclosure is (or is deemed to be) a PID or disclosure under the Corporations Act or Taxation Administration Act, it will be managed in accordance with the relevant whistleblower legislation, as described below, upon receipt by our external provider.

Alternatively you may contact an Australia Post Group Authorised Officer directly via the <u>Australia Post Group</u> Whistleblower Portal

Information to Include

When providing a disclosure you should consider providing as many of the following details as possible, to assist Australia Post Group in determining the best course of action:

- Your name and contact details (recommended, however anonymous disclosures can be made);
- The nature of the wrongdoing;
- The details of the person you think committed the wrongdoing (if the person is a contracted service provider, the provider details and location);
- When and where the wrongdoing occurred;
- Any relevant events surrounding the wrongdoing;
- Anyone else aware of or involved in the wrongdoing;
- Anyone else who may verify the claims;
- If you did anything in response to the wrongdoing;
- If you are concerned about a possible reprisal;
- Any supporting information (e.g. documents, file notes).

The information provided should be clear and factual. Avoid speculation, personal attacks and emotive language.

Handling of your disclosure

After you make a disclosure, the Whistleblower Team will assess whether the disclosure may be protected as a public interest disclosure under the PID Act or a whistleblower disclosure under the Corporations Act or Taxation Administration Act.

You will be informed of any decision to allocate your disclosure to an investigator and given the opportunity to decide whether you wish to have your identity passed on to the investigator. If you do not wish for your identity to be made known to the investigator, this may impact on their ability to investigate your concerns.

If the disclosure does not meet the requirements of a public interest disclosure under the PID Act or a whistleblower disclosure under the Corporations Act or Taxation Administration Act but can be considered under a different policy, the Whistleblower Team will refer the matter to the appropriate team to consider and investigate (where appropriate) the issues further.

Protections under the PID Act, Corporations Act and Taxation Administration Act

If your matter is determined to be a public interest disclosure under the PID Act or a whistleblower disclosure under the Corporations Act or Taxation Administration Act, the following rights apply to you:

- Your disclosure will be handled confidentially and in a timely manner,
- You have immunity from civil, criminal and administrative liability in relation to making a protected disclosure.
- You have protection from contractual remedies being enforced or exercised against you on the basis of your PID.
- You have protection from detriment or reprisal against you for making a disclosure or for being suspected of having made a disclosure.

 $These \ protections \ and \ immunities \ continue \ to \ apply \ after \ any \ investigation \ is \ finalised.$

However, the whistleblower laws will not protect you if you knowingly disclose false or misleading information, or from the consequences of your own wrongdoing identified as a result of your disclosure.

Your responsibilities

The following responsibilities apply to Workforce Participants making a disclosure under the PID Act, the Corporations Act or the Taxation Administration Act:

- Do not knowingly report false or misleading information.
- Be discreet about your disclosure and maintain confidentiality throughout the process.
- Provide reasonable assistance as required during the investigation.
- Alert your supervisor, the authorised officer/eligible recipient or the Whistleblower Team to any problems that you may be facing or possible reprisal action in relation to your disclosure
- Seek appropriate support if you need it.
- Seek independent legal advice about the process and your rights and responsibilities if you need it.

Anonymous Disclosers

When making a disclosure you can elect to either identify yourself or make an anonymous disclosure.

However, in some circumstances remaining anonymous may make it difficult, or even impracticable for Australia Post to investigate your disclosure. Please note also that if you choose to remain anonymous and do not provide a means of contact, it will be difficult for Australia Post to communicate with you throughout the process.

Further information

The PID Act: http://www.ombudsman.gov.au/about/making-a-disclosure

The Corporations Act: https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/

The Taxation Administration Act: https://www.ato.gov.au/general/gen/whistleblowers/