



# Group Whistleblower Policy

## Why this is important

1. This Policy sets out the rights and responsibilities of people involved in a whistleblowing report or investigation and how we support people throughout this process. It is important because IAG is committed to a culture where people feel free to speak up if they see something that isn't right. It supports IAG's purpose and strategy by encouraging people to do the right thing to make the world a safer place.
2. This Policy is designed to produce these outcomes:
  - a) People feel free to speak up if they see something happening at IAG that isn't right,
  - b) People understand IAG's processes for responding to whistleblower reports and understand that they can report wrongdoing safely and confidentially, knowing that they will be protected and that their report will be handled fairly and efficiently,
  - c) Help deter wrongdoing in line with IAG's Risk Management Framework and processes, and
  - d) Ensure IAG meets its legislative and regulatory requirements.

## Who this applies to and when

3. This policy applies to Insurance Australia Group Limited, its subsidiaries and any other entity or joint venture which IAG controls (collectively **IAG**).
4. This policy applies whenever particular disclosures are made by an Eligible Whistleblower to an Eligible Recipient (see Reporting Misconduct for further information).

### **Am I an Eligible Whistleblower?**

*"Eligible Whistleblowers" include current or former employees, contractors, volunteers and directors or company secretaries of IAG. Other people (including suppliers) may also qualify as Eligible Whistleblowers in particular countries (see Appendices for further information).*

## Reporting Misconduct

5. You are encouraged to make a report to the confidential Whistleblower service "ActionLine" if you see or have reasonable grounds to suspect something is happening at IAG that you think is Reportable Conduct.

### **What is Reportable Conduct?**

*Examples of conduct which may be "Reportable Conduct" include theft, fraud, money laundering, insider trading, financial irregularities, bribery, corruption, conflicts of interest, criminal damage to property, violence, bullying, certain breaches of IAG policies or codes, discrimination or harassment, workplace health and safety risks, leaking confidential information, deliberate concealment of any of the foregoing, or harming someone who makes a report under this Policy. It does not always involve breaking the law.*

*While we encourage everyone at IAG to speak up and report any concerns, not all types of concerns are intended to be covered by this Policy. For example, Reportable Conduct does NOT generally include personal work-related grievances or customer complaints.*

*Personal work-related grievances are grievances about something in relation to your current or former employment or engagement that have implications for you personally (such as interpersonal conflicts or decisions about promotion, remuneration or termination). If your work-related grievance also includes Reportable Conduct, and it is reported in accordance with this Policy, it will still be handled in accordance with this Policy.*

*Additional information about the definition of "Reportable Conduct" in Australia, New Zealand and Singapore is set out in the Appendices.*

6. You can make a report to ActionLine by telephone, email, letter or via the website at any time. The contact details for the ActionLine are in the table below:

CONTACT DETAILS FOR THE WHISTLEBLOWER CONFIDENTIAL SERVICE – ActionLine	
<b>Website</b>	<a href="https://australia.deloitte-halo.com/whistleblower/website/IAG">https://australia.deloitte-halo.com/whistleblower/website/IAG</a>
<b>Email</b>	IAGActionLine@deloitte.com.au
<b>Telephone</b>	Australia: +61 1800 110 287 New Zealand: 0800 407 627 Singapore: +61 3 9667 5058
<b>Mail</b>	IAG ActionLine Reply Paid 12628 A'Beckett Street VICTORIA 8006 AUSTRALIA

7. If you make a disclosure under this Policy, you are expected to have reasonable grounds to believe that the information you are disclosing is true. You will not be penalised even if the information turns out to be incorrect.
8. You can report something anonymously if you prefer, but the investigation may be more effective if you share your identity. If you do share your identity and consent to it being disclosed, it will be shared with the people involved in the investigation and the Whistleblower Protection Officer.
9. If you share your identity and consent to it being disclosed, IAG will contact you to tell you about the progress of the investigation. We may also contact you if more information is needed to finish the investigation. The Whistleblower Protection Officer will support you during the investigation if required.
10. While you are encouraged to report suspected Reportable Conduct through ActionLine, there are certain other people to whom you can report in Australia, New Zealand and Singapore and still receive the protections described in this Policy. Further information about these recipients, which together with the ActionLine are “Eligible Recipients”, is set out in Appendix B for Australia and Appendix C for New Zealand.

## Confidentiality, Protection and Support

11. If you are an Eligible Whistleblower and you report something that is Reportable Conduct to an Eligible Recipient, you will be protected and supported in these ways:

### Protecting your identity

- a) You can remain anonymous and, if you prefer, you do not have to answer questions that may reveal your identity during any follow-up conversations or any investigation process, including following the finalisation of an investigation.
- b) IAG will keep your identity (and information likely to identify you) confidential. IAG can share information about your report if it is needed to investigate the matter but will not disclose your identity (or information likely to identify you) except if:
  - i. You give your consent to disclose that information,
  - ii. The disclosure is allowed or required by law (see Appendices for further information),
  - iii. The disclosure is to a lawyer in order to get legal advice, or
  - iv. In the case of information likely to identify you, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out your identity.
- c) IAG will adopt appropriate measures to protect your identity. This will include some or all of the following:
  - i. Referring to you by a pseudonym and/or in a gender-neutral way,

- ii. Redacting personal information or references to you,
- iii. Making sure your report is managed by people who are trained and qualified,
- iv. Ensuring paper and electronic documents and other materials relating to your report are stored securely,
- v. Only disclosing your identity or information that is likely to lead to your identification in accordance with section 11(b) of this Policy and to a restricted number of people who are directly involved in handling and investigating your report, and
- vi. Reminding each person who is involved in handling and investigating your report about the confidentiality requirements, including the consequences of an unauthorised disclosure.

### **Protecting you from detriment**

- d) IAG will not take any detrimental conduct against you, and will not tolerate any detrimental conduct against you, for making a report (such as through harassment, bullying, discrimination or dismissal).
- e) You will not have any legal liability just because you made a report but if the report involves your own Reportable Conduct, you will not be protected from the consequences of that Reportable Conduct.
- f) You can seek advice from or make a complaint to the Whistleblower Protection Officer if you or someone else is being subject to detrimental conduct, or you are concerned you may be subject to detrimental conduct.
- g) If you are an IAG employee or contractor or immediate family member, you can get confidential support and counselling in Australia, Asia and New Zealand through IAG's EAP provider, Sonder. You can access Sonder by phone: Australia 1800 234 560, New Zealand 0800 447 444, Singapore 800 49 222 55.
- h) If you are a member of IAG NZ's personnel or an immediate family member, you can get confidential support and counselling by calling Sonder: Australia 1800 234 560, New Zealand 0800 447 444, Singapore 800 49 222 55.
- i) The Appendices set out further specific protections that apply in Australia, New Zealand and Singapore if your report qualifies for legal protection in those countries. This Policy should not be seen as legal advice. You are encouraged to obtain your own legal advice if you require advice on the applicability of any whistleblowing laws. Where there is any inconsistency between this Policy and an Appendix, the relevant Appendix will apply.

## **Response and Investigation**

12. If you make a report under this Policy:

- a) Where practicable, IAG will contact you within 10 business days to acknowledge receipt of your report.
- b) IAG's response to a report will vary depending on the nature of the report and the amount of information provided. To be investigated, we must have enough information for us to do so.
- c) All reports will be properly assessed and considered by IAG and a decision made as to whether they should be formally investigated or internally resolved. If an investigation is required, it will be conducted confidentially, fairly, objectively, and without bias.
- d) If appropriate, you will be told how IAG has decided to respond to your disclosure, including whether an investigation will be conducted.
- e) IAG will aim to conclude the investigation as efficiently as possible. The length and complexity of the investigation will depend on the nature of the report made.
- f) Where practicable, IAG will aim to update you about the general progress of the investigation on a monthly basis until the investigation is finalised.
- g) Investigations will generally be overseen by the Whistleblower Coordinator, subject to any potential conflicts of interest or other concerns. Other people, including employees or external advisers, may also be asked to assist or run the investigation.

- h) Anyone asked to investigate or participate in an investigation must advise the Whistleblower Coordinator of any real or potential conflict of interest.
- i) For procedural fairness, unless there are confidentiality or other reasons not to do so, persons to whom a report relates will be provided with details of the report that involves them at an appropriate time and be given an opportunity to respond.
- j) If your concerns about Reportable Conduct are substantiated, then appropriate disciplinary steps or other action will be taken. Due to confidentiality reasons, you will not generally be provided with details of the action taken. If your concerns have not been substantiated, an explanation will be provided to you subject to any relevant privacy and confidentiality considerations.
- k) The results of any investigation will be recorded in writing in a formal internal report that will be confidential and is the property of IAG. You will not receive a copy of any investigation report.
- l) IAG's Board Risk Committee will receive a summary of reports made under this Policy at least quarterly and additional information about any material incidents raised.

## Lodging a Complaint

13. If you have a complaint that:
- a) this Policy has not been followed, including a breach of confidentiality,
  - b) an investigation outcome is inappropriate, or
  - c) an act (or concern about an act) of detriment (see section 11) has not been adequately addressed,
  - d) you can lodge a complaint with the Whistleblower Protection Officer.

## Availability of this Policy and training

14. IAG will provide mandatory training on this Policy to its officers and employees and provide access to this Policy on IAG's public website.

## Roles and Responsibilities

15. The responsibilities in relation to this Policy are set out in the table below:

Position	Accountabilities
<b>Eligible Recipient</b>	<ul style="list-style-type: none"> <li>• Receiving reports made under this Policy and following this Policy.</li> </ul>
<b>Whistleblower Protection Officer</b>	<ul style="list-style-type: none"> <li>• Protecting Eligible Whistleblowers from loss or damage because they made a report under this Policy.</li> <li>• Making sure the protection and support in section 11 are provided to Eligible Whistleblowers who report Reportable Conduct.</li> <li>• Providing guidance and support if someone makes a complaint or reports a concern, including about an investigation, confidentiality or protection under this Policy.</li> </ul>
<b>Whistleblower Coordinator</b>	<ul style="list-style-type: none"> <li>• Coordinating investigations of whistleblower complaints in accordance with this Policy.</li> <li>• Responding to whistleblower complaints and providing updates on investigation progress and outcomes.</li> <li>• Understanding and communicating appropriate details of any consequences to the relevant IAG Committees.</li> <li>• Answering questions about this Policy.</li> <li>• Reviewing the provider of the ActionLine at least once each year to assess if they are providing the service in a way that meets this Policy and IAG's needs.</li> <li>• Making sure the right people are appointed to conduct investigations under this Policy.</li> </ul>

Position	Accountabilities
<b>Group General Counsel and Company Secretary (Policy Owner)</b>	<ul style="list-style-type: none"> <li>• Reviewing this Policy at least every three years.</li> <li>• Making sure the right people are appointed to the position of Whistleblower Coordinator and Whistleblower Protection Officer.</li> <li>• Reviewing those appointments at least every two years.</li> <li>• Monitoring compliance with this Policy.</li> <li>• Making sure this Policy is available on IAG's intranet and external website.</li> <li>• Making sure people are trained about this Policy and their accountabilities under it.</li> </ul>
<b>Board of Insurance Australia Group Limited (Policy Approver)</b>	<ul style="list-style-type: none"> <li>• Approve or reject the Policy and any changes which are not minor administrative changes.</li> <li>• If appropriate, direct the Policy Owner to make any amendments that the Policy Approver thinks are necessary.</li> <li>• Monitoring the effectiveness of this Policy.</li> </ul>

## Breaches

16. If you breach this Policy, IAG may take disciplinary action against you. This will depend on the circumstances, including if your breach is deliberate, how bad it is and if you have done it before. Disciplinary action could include a warning, dismissal, or IAG ending its business relationship with you.
17. A breach of this Policy may also result in criminal or civil liability. Refer to the Appendices (as applicable) for more information.
18. If you become aware of a breach of this Policy, tell IAG's General Counsel – Corporate and Commercial, who will make sure it is investigated.

## Definitions

19. In this Policy:

**“Eligible Recipient”** means someone you can make a report to whilst qualifying for protection under this Policy, including ActionLine and certain other people in particular countries as described in the Appendices.

**“Eligible Whistleblower”** means a person who is or has been

- (i) an employee, contractor or volunteer of IAG,
- (ii) a director or company secretary of IAG,
- (iii) in relation to particular countries, anyone else listed as an Eligible Whistleblower in the applicable Appendix.

**“Reportable Conduct”** means conduct in relation to IAG which is covered by whistleblowing protections in particular countries as described in the Appendices and may include conduct that amounts to actual or suspected misconduct, or an improper state of affairs or circumstances, or constitutes a breach of or an offence against certain legislation, or represents a danger to the public or the financial system. It does not generally include personal work-related grievances or customer complaints.

## Contacts for questions and more information

20. This Policy is owned by IAG's Group General Counsel and Company Secretary. If you have any questions or want more information about this Policy, please contact:
  - Whistleblower Protection Officer,
  - Whistleblower Coordinator, or
  - General Counsel – Corporate and Commercial.

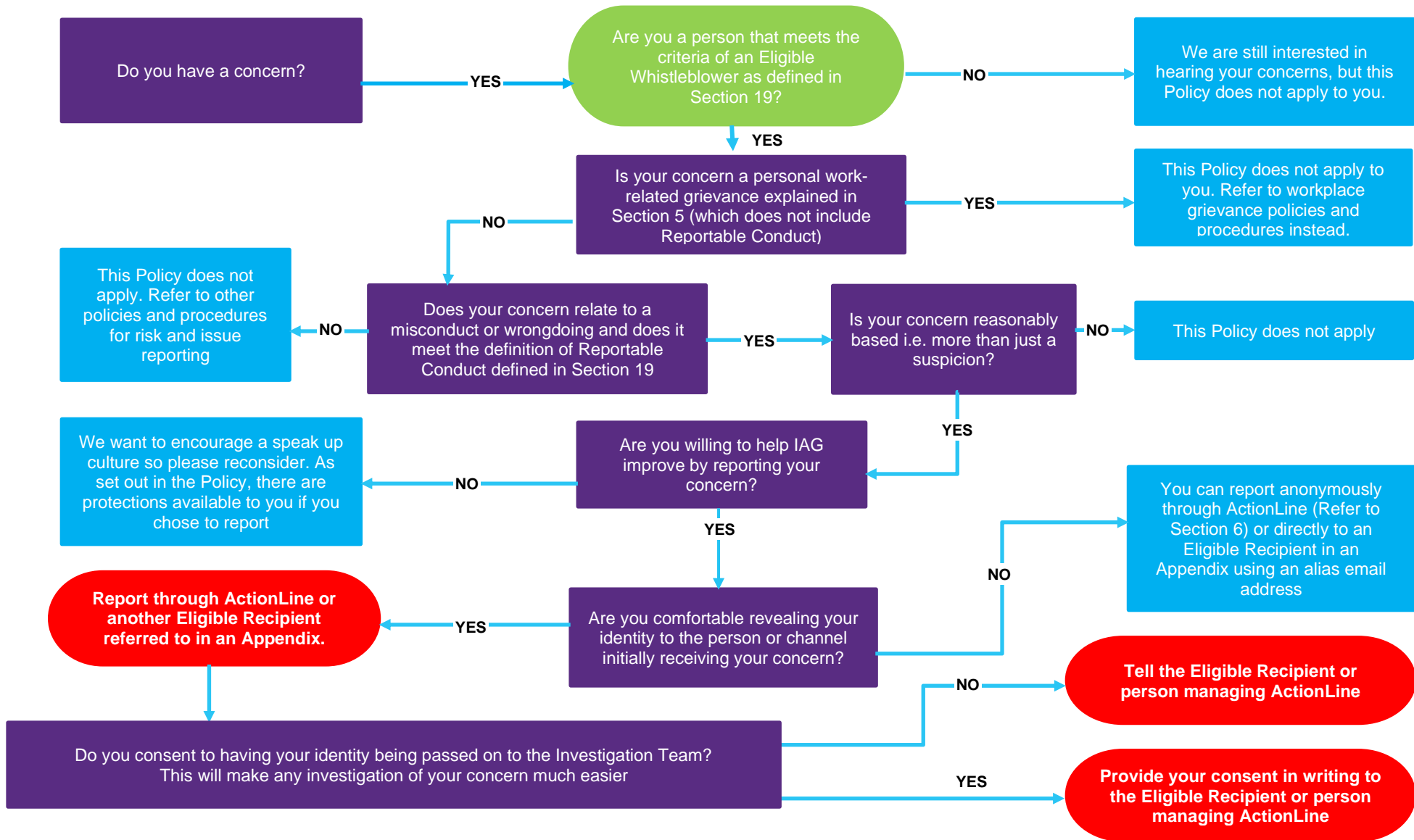
## Policy information

<b>Effective from</b>	11 August 2022
<b>Owner</b>	Group General Counsel and Company Secretary
<b>Approver</b>	Board of Insurance Australia Group Limited
<b>Next Review due</b>	August 2025
<b>Entities this applies to</b>	Insurance Australia Group Ltd, its subsidiaries and any other entity or joint venture which IAG controls (collectively <b>IAG</b> ).
<b>Exemptions</b>	None
<b>Related documents</b>	List the key document that should be read in conjunction with this Policy: <ul style="list-style-type: none"><li>• Code of Ethics and Conduct</li><li>• Group Risk Management Strategy (RMS)</li><li>• IAG NZ Risk Management Programme</li><li>• Group Anti-Money Laundering &amp; Counter Terrorism Financing Policy</li><li>• Group Conduct Risk Policy</li><li>• Group Fit &amp; Proper Policy</li><li>• IAG NZ Fit &amp; Proper Policy</li><li>• Group Master Privacy Policy</li><li>• IAG NZ Privacy Policy</li><li>• Group Anti-Bribery &amp; Corruption Policy</li><li>• Group Conflicts of Interest Policy</li><li>• Group Fraud Policy</li><li>• Group Information Security Policy</li></ul>

## Document history

Version	Date	Amended by	Details of amendment
1	21 April 2020	Policy Review Committee	Updated for new group policy template.
2	11 August 2022	Legal and Company Secretariat	<ul style="list-style-type: none"><li>• Ownership change from GIA to LCS,</li><li>• New and/or updated country specific Appendices for Australia, New Zealand and Singapore,</li><li>• Incorporates new whistleblower laws in New Zealand,</li><li>• Overall content review incorporating ASIC's feedback to public companies requesting additional information in whistleblower policies to ensure compliance with the <i>Corporations Act 2001</i> (Cth).</li></ul>
3	9 November 2023	Legal and Company Secretariat	<ul style="list-style-type: none"><li>• Support provider updated from CARE program and Benestar to Sonder, including contact numbers (paragraph 11 and Appendix C)</li><li>• Next Review Date updated to every three years in line with updated Group Policies and Procedures Policy, approved April 2023</li></ul>
3.1	April 2024	Legal and Company Secretariat	<ul style="list-style-type: none"><li>• Added Singapore ActionLine contact number</li></ul>
3.2	July 2024	Legal and Company Secretariat	Administrative changes: <ul style="list-style-type: none"><li>• ActionLine ULR fixed;</li><li>• Username and password removed as no longer required.</li></ul>
3.3	December 2024	Legal and Company Secretariat	Updating the list of eligible and authorised recipients for tax-related disclosures in response to regulatory changes.

# Appendix A – Flowchart for people raising concerns



## Appendix B – Australia

In addition to the Policy, please note the following if you are reporting from Australia or your concern or report relates to anyone or conduct connected to IAG’s business in Australia.

### When legislative protections may apply

Under Australian law, including the *Corporations Act 2001* (Cth) (the **Corporations Act**) and the *Taxation Administration Act 1953* (Cth) (the **Tax Act**), legislative protections are available to current and former employees, volunteers, officers, contractors, suppliers, employees of suppliers, associates of IAG, as well as these people’s relatives and dependants who make a ‘protected disclosure’ to certain people (**Eligible Whistleblowers**).

For an IAG superannuation entity, Eligible Whistleblowers also include trustees, custodians or investment managers, officers or employees of a company that is a trustee, custodian or investment manager, suppliers (or officers or employees of a supplier) of goods or services to the trustee, custodian or investment manager, and relatives and dependents of any of them who make a ‘protected disclosure’ to certain people.

You are encouraged to make a disclosure to ActionLine, as set out in section 6 of the Policy. However, the law can still offer protections if you make a protected disclosure to a person identified in this Appendix. A disclosure can qualify for protection under the law even if it is made anonymously or turns out to be incorrect.

### Protected disclosures

To be a protected disclosure qualifying for protection under the Corporations Act or Tax Act (as applicable), the disclosure must relate to a ‘disclosable matter’ and be made to an ‘Eligible Recipient’ under the law. A disclosable matter constitutes Reportable Conduct under this Policy. Other matters disclosed under the Policy, but which do not meet these criteria will not qualify for protection under the Corporations Act or Tax Act. Examples of this type of information and recipients are outlined in the following table.

Disclosable matters	Eligible Recipients
<p><b>General disclosable matters</b></p> <ul style="list-style-type: none"> <li>• Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to IAG; and</li> <li>• Information that IAG, or any officer or employee of IAG, has engaged in conduct that:               <ul style="list-style-type: none"> <li>○ contravenes or constitutes an offence against certain legislation (e.g. the Corporations Act); or</li> <li>○ represents a danger to the public or the financial system; or</li> <li>○ constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more</li> </ul> </li> </ul> <p>Note that ‘personal work-related grievances’ are not protected disclosures under the law, except as noted below</p>	<p><b>Eligible Recipients for any general disclosable matters</b></p> <ul style="list-style-type: none"> <li>• A person authorised by IAG to receive protected disclosures – i.e. ActionLine (see section 6 of the Policy)</li> <li>• An officer of IAG (this includes a director or company secretary of Insurance Australia Group Limited or any of its related bodies corporate (as defined under the Corporations Act))</li> <li>• A senior manager of IAG. This is the Corporations Act definition and not a reference to an IAG or subsidiary specific role or title. It includes IAG GLT members and any other senior manager of Insurance Australia Group Limited or its related bodies corporate (as defined under the Corporations Act)</li> <li>• An auditor, or a member of an audit team conducting an audit, of IAG</li> <li>• An actuary of IAG</li> <li>• ASIC, APRA or another Commonwealth body prescribed by regulation</li> <li>• A legal practitioner for the purposes of obtaining legal advice or legal representation (even if the legal practitioner concludes the disclosure does not relate to a disclosable matter)</li> <li>• Journalists or parliamentarians, under certain circumstances allowing emergency and public interest disclosures. It is important for you to understand the</li> </ul>



Disclosable matters	Eligible Recipients
	criteria for making a public interest or emergency disclosure before doing so
<p><b>Tax-related disclosable matters</b></p> <ul style="list-style-type: none"> <li>Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of IAG or an associate (as defined in the <i>Income Tax Assessment Act 1936</i> (Cth)), which you consider may assist the eligible recipient to perform functions or duties in relation to the tax affairs of IAG or an associate</li> </ul>	<p><b>Recipients for any tax-related disclosable matters</b></p> <ul style="list-style-type: none"> <li>A person authorised by IAG to receive reports of tax-related disclosable matters – i.e. ActionLine (see section 6 of the Policy)</li> <li>The Inspector-General of Taxation</li> <li>An auditor, or a member of an audit team conducting an audit, of IAG</li> <li>A registered tax agent or BAS agent who provides tax services or BAS services to IAG</li> <li>A director, secretary or senior manager of IAG (this is the Corporations Act definition and not a reference to an IAG role or title). It includes IAG GLT members and any other senior manager of Insurance Australia Group Limited or its related bodies corporate (as defined under the Corporations Act)</li> <li>An employee or officer of IAG who has functions or duties that relate to the tax affairs of IAG</li> <li>An entity prescribed in the <i>Taxation Administration Regulations 2017</i> (Cth), of which the discloser is a member, for the purpose of obtaining assistance in relation to the disclosure</li> <li>A legal practitioner for the purpose of obtaining legal advice or legal representation</li> <li>A medical practitioner or psychologist, for the purposes of obtaining medical or psychiatric care, treatment, or counselling</li> </ul>
<p><b>Further tax-related information</b></p> <p>Information that the discloser considers may assist in the performance of functions or duties under a taxation law in relation to IAG or an associate (as defined in the <i>Income Tax Assessment Act 1936</i> (Cth))</p>	<p><b>Recipients for any further tax-related information</b></p> <ul style="list-style-type: none"> <li>Commissioner of Taxation</li> <li>Tax Practitioners Board (<b>TPB</b>) (in relation to functions or duties under the <i>Tax Agent Services Act 2009</i> (Cth))</li> <li>An entity prescribed in the <i>Taxation Administration Regulations 2017</i> (Cth), which the discloser is a member, for the purpose of obtaining assistance in relation to the disclosure</li> <li>A legal practitioner for the purpose of obtaining legal advice or legal representation</li> <li>A medical practitioner or psychologist, for the purposes of obtaining medical or psychiatric care, treatment, or counselling.</li> </ul>

Legal protection for disclosures about solely personal employment related matters are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if, in summary:

- it concerns detriment to you because you have or may be considering making a 'protected disclosure'; or
- it is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about whistleblowers.

Under the law, a grievance is **not** a 'personal work-related grievance' if it:

- has significant implications for IAG;

- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;
- concerns conduct or alleged conduct that represents a danger to the public or financial system; or
- concerns conduct or alleged conduct prescribed by the regulations made under the Corporations Act.

## Specific protections and remedies

Legislative protections may be available in respect of protected disclosures, including but not limited to:

- it is illegal for a person to identify you, or disclose information that is likely to lead to your identification, except in certain circumstances including:
  - those referred to in section 11 of the Policy; and
  - if the disclosure is by IAG to the Australian Securities and Investments Commission, Australian Prudential Regulation Authority, Australian Taxation Office, Australian Federal Police, a Commonwealth, State or Territory authority for the purposes of assisting the authority in the performance of its functions or duties, or to any other body which may be prescribed by legislation from time to time; and
- you are protected from detrimental acts or omissions in relation to making the disclosure and can seek compensation and other remedies through the Courts if you suffer loss, damage or injury because of a disclosure and IAG has failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

In some instances, conduct which breaches the above may also be a criminal offence.

You are also protected from the following in relation to a protected disclosure you make:

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

However, you will not have immunity for any misconduct you have engaged in that is revealed in a protected disclosure.

## Appendix C – New Zealand

In addition to the Policy, please note the following if you are reporting from New Zealand or your concern or report relates to anyone or conduct connected to IAG's business in New Zealand.

### When legislative protections may apply

This Appendix applies to IAG's entities registered in New Zealand (referred to as **IAG NZ**).

Under New Zealand law (which includes the *Protected Disclosures (Protection of Whistleblowers) Act 2021 (NZ Act)*, *Human Rights Act 1993* and *Employment Relations Act 2000*), legislative protections are available to current or former employees, secondees, contractors, directors and volunteers of IAG NZ (**Discloser**). Disclosers are Eligible Whistleblowers under this Policy. A Discloser will be entitled to legislative protections if they report serious wrongdoing to an Eligible Recipient identified in this Appendix. Serious wrongdoing is defined below, and constitutes Reportable Conduct under this Policy.

You are encouraged to make a disclosure about serious wrongdoing to the ActionLine, as set out in section 6 above. However, the law can still offer protection if you make a protected disclosure to an Eligible Recipient identified in this Appendix. A disclosure can qualify for protection under the law even if it is made anonymously or turns out to be incorrect.

### Protected Disclosures

To be a 'protected disclosure' qualifying for protection under the NZ Act, you must:

- be a Discloser (i.e., an Eligible Whistleblower);
- believe on reasonable grounds that there is, or has been, serious wrongdoing (as defined below) (i.e. there is or has been Reportable Conduct in or by IAG NZ);
- report the serious wrongdoing / Reportable Conduct to the ActionLine or another Eligible Recipient (as identified below); and
- not make the disclosure in bad faith.

### Serious Wrongdoing

As noted above, serious wrongdoing constitutes Reportable Conduct under this Policy. A disclosure will only be protected under the NZ Act where it relates to "**serious wrongdoing**". This is defined in the NZ Act as an act, omission, or course of conduct in (or by) IAG NZ that is one or more of the following:

- an offence under any New Zealand legislation;
- a serious risk to:
  - public health;
  - public safety;
  - the health or safety of any individual, or
  - the environment;
- a serious risk to the maintenance of law, including:
  - the prevention, investigation, and detection of offences; or
  - the right to a fair trial;
- an unlawful, corrupt, or an irregular use of public funds or public resources; and
- oppressive, unlawfully discriminatory, or grossly negligent, or gross mismanagement by a person performing (or purporting to perform) a function or duty or exercising (or purporting to exercise) a power on behalf of a public sector organisation or the Government.

A personal grievance will not usually constitute serious wrongdoing under the NZ Act. It is only if the personal grievance relates to or involves serious wrongdoing (such as conduct which presents a serious risk to health or safety), that the Discloser will be entitled to protections under the NZ Act (provided the Discloser reports the serious wrongdoing to an Eligible Recipient in accordance with this Appendix).

### Eligible Recipients

In addition to ActionLine (as referred to in section 6 of the Policy), under the NZ Act you can also report serious wrongdoing to other 'Eligible Recipients', which includes IAG NZ Leadership Team, board members or head or deputy heads of IAG (NZ) Holdings Limited or any of its subsidiaries registered in New Zealand. It also includes an Appropriate Authority (as outlined below).

An Appropriate Authority includes:

- the head of any public sector organisation;
- any officer of Parliament (which does not include a Minister or a member of Parliament); and
- the membership body of a particular profession, trade, or calling with the power to discipline its members (e.g. the Insurance Council of New Zealand); and
- by way of example:
  - Reserve Bank of New Zealand (for concerns about insurers);
  - Ministry of Business, Innovation, and Employment (for concerns about professional or trade conduct);
  - Human Rights Commission (for concerns about bullying, discrimination harassment or racism);
  - WorkSafe (for concerns about health and safety); and
  - Ombudsman (for concerns about whistleblowing and protected disclosures).

If you believe on reasonable grounds that IAG NZ (or the Appropriate Authority) has not dealt with the protected disclosure in accordance with the guidance set out in the NZ Act (detailed below), or that IAG NZ (or the Appropriate Authority) has not dealt with the matter so as to address the serious wrongdoing, you are entitled to protection under the NZ Act for a protected disclosure made to a Minister.

## Specific protections and remedies

The types of legislative protections which may be available in respect of a protected disclosure are set out below.

The NZ Act requires an Eligible Recipient to use their best endeavours to keep information that might identify the Eligible Whistleblower confidential, unless they consent to the release of the identifying information or there are reasonable grounds to believe the release of the identifying information is essential to:

- the effective investigation of the disclosure;
- prevent serious risk to public health, public safety, the health or safety of any individual, or the environment;
- comply with the principles of natural justice; or
- an investigation by a law enforcement or regulatory agency for the purpose of law enforcement.

Where IAG NZ considers the release of the identifying information essential to the effective investigation of the disclosure and/or to comply with the principles of natural justice, IAG NZ will consult with you about the release. If IAG NZ considers the release of the identifying information essential to prevent a serious risk to health and/or safety or for the purposes of law enforcement, IAG NZ will consult with you if it is practicable to do so. In any event, IAG NZ will notify you when identifying information has been disclosed.

IAG NZ may also (after consulting with you and the intended Eligible Recipient of the referral) refer the disclosure to an Appropriate Authority. The Appropriate Authority that receives the referral becomes the 'receiver of the disclosure' (i.e. the Eligible Recipient for the purposes of the NZ Act).

Where the NZ Act applies and you are an IAG NZ employee, you are protected from retaliation as a result of a protected disclosure. If this protection from retaliation is breached by IAG NZ, and you are an IAG NZ employee, you will have a 'personal grievance' under the Employment Relations Act 2000. It is also a breach of the NZ Act and the Human Rights Act 1993 for you (whether or not you are an IAG NZ employee) to be treated less favourably (or to be threatened with less favourable treatment) as a result of a protected disclosure.

You will not be liable to any civil, criminal, or disciplinary proceeding because of making a protected disclosure. However, you will not have immunity for any misconduct you have engaged in that is revealed in a protected disclosure.

## Public Interest Disclosures

Unlike in Australia, New Zealand does not provide for public interest or emergency disclosures to journalists (see Appendix B). If you are considering making a disclosure to a journalist, please obtain legal advice prior to disclosure to ensure you understand your protection entitlements of doing so.

## Support and information

If you are a member of IAG NZ's personnel or an immediate family member, you can get confidential support and counselling by calling Sonder – Employee Assistance Program: Australia 1800 234 560, New Zealand 0800 447 444, Singapore 800 49 222 55.

If you are unsure whether the information you want to disclose relates to a serious wrongdoing within New Zealand, please refer to the following guidance for a checklist for making protected disclosures, and more information, including contact details for the above listed Appropriate Authorities (Ombudsman Guidance).

## Appendix D – Singapore

In addition to the Policy, please note the following if you are reporting from Singapore or your concern or report relates to anyone or conduct connected to IAG's business in Singapore.

### When legislative protections may apply

Under Singapore law, legislative protections apply in the following instances:

- the *Prevention of Corruption Act 1960* (**PCA**) provides protection for the anonymity of whistleblowers who report on corruption;
- the *Misuse of Drugs Act 1973* (**MDA**) protects the identity of whistleblowers who report on offences involving the use and/or traffic of controlled drugs and substances;
- the *Betting Act 1960* (**BA**) protects the identity of whistleblowers who report on offences relating to participation in common betting houses and betting information centres;
- the *Workplace Safety and Health Act 2006* (**WSHA**) protects whistleblowers on the physical conditions, safety measures and hazards of a work environment; and
- the *Companies Act 1967* (**CA**) protects auditors from defamation suits.

### Specific protections and remedies

Legislative protections apply where information relating to offences within the above listed statutes are provided. Specifically:

- the PCA, MDA and BA provide that a whistleblower's name, address, or any matter which might lead to discovering his/her identity will not be disclosed to any witness. Further, if any evidence, such as books, documents or papers are to be inspected during proceedings, the court will ensure that the whistleblower's details, which may be found in the evidence, will be concealed or destroyed such that his/her identity will be protected. However, if it is found that the whistleblower had knowingly made a false statement, the whistleblower's identity may be disclosed;
- the WSHA provides that IAG must not dismiss or threaten to dismiss an employee of IAG because the employee:
  - has assisted (whether by the giving of information or otherwise) an inspector or authorised person as may be appointed by the Minister or any other public authority in the conduct of any inspection or investigation under the WSHA for a breach or an alleged breach of the WSHA, or proposes to do so; or
  - has in good faith sought the assistance of, or made a report to an inspector or authorised person in relation to a safety and health matter, or proposes to do so; and
- the CA provides that an auditor shall not, in the absence of malice on the auditor's part, be liable to any action for defamation at the suit of any person in respect of any statement which the auditor makes in the course of the auditor's duties, whether the statement is made orally or in writing.