Whistleblower Policy

Effective: 16 September 2025

Australian Military Bank

1. Purpose and scope

Australian Military Bank (Bank) is committed to promoting a culture of integrity and ethical behaviour, corporate compliance, and good corporate governance where decisions, actions and conduct reflect and reinforce our values. If a whistleblower raises a concern under this policy, they should feel confident that this can be done without any fear of detriment or retaliation.

This policy helps deter wrongdoing by encouraging the reporting of any instances of real or suspected misconduct or an improper state of affairs or circumstances in relation to the Bank. This policy provides a framework for receiving, handling, investigating and addressing allegations of Reportable Conduct.

This policy applies to all current and former Officers and Employees of the Bank, including volunteers, contractors and on-hire workers engaged by the Bank. It also includes the relatives, dependents and spouses of those people as well any organisation (and its employees) that has a relationship or is associated with the Bank as a customer, supplier, adviser, agent or otherwise. This policy also applies to any other person who has knowledge of any suspected wrongdoing or unethical behaviour concerning the Bank's business affairs or its workers.

2. Policy requirements

2.1. Legislative or Regulatory Requirements

- ASIC Regulatory Guide 270 – Whistleblower policies
- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)
- Corporations Act 2001 (Cth)
- Taxation Administration Act 1953 (Cth)

2.1.1. Requirements of Policies & Procedures

This policy provides details on:
- The importance of raising whistleblower concerns;
- Who qualifies for protection as a whistleblower under the Corporations Act 2001;
- How to raise a whistleblower concern;
- How whistleblower concerns will be dealt with; and
- Rights and protections of whistleblowers under the Corporations Act 2001.

2.1.2. Whistleblower concerns

Reports about wrongdoing can be about any suspected or actual misconduct or an improper state of affairs or circumstances in relation to the Bank (**Reportable Conduct**). This policy supports the reporting of allegations of Reportable Conduct and protects a whistleblower who acts honestly and has a reasonable belief of suspected or actual Reportable Conduct within the organisation.

Individuals both within and external to the Bank can raise a whistleblower concern and qualify for protection under the Corporations Act 2001.

2.1.3. Reportable Conduct

Reportable Conduct includes an activity, conduct or state of affairs that is illegal, unethical or improper which may include (but is not limited to) a disclosure of information if the whistleblower has reasonable grounds to suspect that the Bank or an Officer or Employee of the Bank has engaged in conduct that:

- Constitutes an offence against, or a contravention of, a provision of the Corporations Act 2001 (Cth), Australian Securities and Investments Commission Act 2001 (Cth), the Banking Act 1959, the Financial Accountability Regime Act 2003, the Financial Sector (Collection of Data) Act 2001, the Insurance Act 1973, the Life Insurance Act 1995, the National Consumer Credit Protection Act 2009, or the Superannuation Industry (Supervision) Act 1993; or the Australian Charities and Not-for-profits Commission Act 2012 (Cth);
- 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 Australian financial system, including conduct that poses significant risk to public safety or the stability of, or confidence in, the Australian financial system, whether or not it is in breach of any law.

Examples of Reportable Conduct include:

- Illegal conduct (including theft, fraud, violence or threatened violence, criminal damage against property);
- Unethical behaviour;
- Failure to comply with a legal obligation including taxation obligations;
- Significant breaches of a Bank Policy or Procedure;
- Breach of Commonwealth or State legislation or local authority by-laws;
- Activities that represent a danger to the public or the financial system;
- Risks to the health and safety of workers or customers;
- Recrimination against someone because they participated in an investigation or review;
- Sabotage, violence, drug and alcohol sale or use;
- Any instruction to cover up or attempt to cover up serious wrongdoing;
- Any other conduct which may cause significant financial or non-financial loss to the Bank or be otherwise detrimental to the interests of the Bank;
- Destruction, alteration, mistreatment of, or removal of any asset, data or information for an improper purpose; and
- Obtaining or offering secret commissions.

Matters not relating to Reportable Conduct or 'disclosable matters' do not qualify for protection under the Corporations Act 2001. Further, personal work-related grievances may be excluded from this policy if they do not also relate to Reportable Conduct.

A whistleblower whose disclosure turns out to be incorrect may still qualify for protection.

2.1.4. Personal Work-Related Grievances

Personal work-related grievances related to the whistleblower's current or former employment, that has implications for the whistleblower personally, are generally not covered under this policy. Examples of a personal work-related grievance include complaints an Employee, or former Employee, may hold concerning:

- An interpersonal conflict between Employees;
- Decisions related to a transfer or promotion;
- The terms and conditions of employment; and
- Any disciplinary or performance management process (including dismissal).

Personal work-related grievances should be referred to the Chief People and Operations Officer (**CPOO**).

However, an exception to the above applies if a disclosure about personal work-related grievance:
- Relates to misconduct;
- Involves detrimental conduct to the whistleblower;
- Involves a breach of employment laws;
- Is regarding conduct engaged by the Bank that represents a danger to the public; or
- Relates to the whistleblower seeking legal advice or representation of whistleblower protections.

2.1.5. False disclosures

It is important to disclose Reportable Conduct in good faith and with reasonable grounds for believing the information is true or likely to be true. Where a report has been found to be false (i.e. the person knew the information reported was untrue), the whistleblower will not be able to access the whistleblower protections.

Deliberate false reporting will be treated as serious misconduct by the Bank.

3. Reporting a Whistleblower concerns

3.1. Who can receive a report

Reportable Conduct can be disclosed through the following avenues:
a) Externally via Stopline;
b) Internally, via the Bank 's Whistleblower Protection Officer (WPO);
c) Via any Officer or Executive of the Bank;
d) Via the Bank's Audit Partners; or
e) Via emergency disclosure.

3.1.1. Stopline call service

A disclosure can be made via the Stopline Service, a free external hotline and reporting service independently monitored by Stopline.

Calls will be received by Stopline on recognised business days between 7.00am and 5.00pm (AEST). Outside these times, a caller may leave a voicemail and Stopline will return the call upon resumption of Stopline's normal business hours.

The Stopline operator will prepare a report which details the wrongdoing reported by the whistleblower. All Stopline reports will be forwarded to the WPO for action, unless the unlikely event arises where the WPO is involved in the matter in which case an alternate contact will be used.

The details for Stopline are set out below:

Stopline	Web: australianmilitarybank.stoplinereport.com Email: makeareport@stopline.com.au Phone: 1300 30 45 50 Address: Stopline PO Box 403, Diamond Creek, VIC 3089

3.1.2. Whistleblower Protection Officer (WPO)

A disclosure can be made to the WPO. The WPO is responsible for protecting or safeguarding the whistleblower and ensuring the integrity of the reporting mechanism. The WPO will also be able to provide confidential advice or information to the person making the disclosure about the following:

- The application of this policy;
- The disclosure process; and
- How the report will be handled.

Whistleblower Protection Officer	**Chief People & Operations Officer** Email: whistleblower@australianmilitarybank.com.au Phone: 1300 13 23 28 Address: Whistleblower Protection Officer Australian Military Bank PO Box H151, Australia Square, NSW 1215

3.1.3. Officer or Executive of the Bank

Reportable Conduct can also be disclosed to an Officer of the Bank. This includes a Director or Executive at the Bank who makes, or participates in making decisions that affect the whole, or a substantial part, of the business of the company, or who has the capacity to affect significantly the Bank's financial and/or reputational standing.

An Officer who receives a whistleblower disclosure will immediately forward details of the report to the WPO. By making a whistleblower report to an Officer (who is not the WPO) a whistleblower consents to the details of the disclosure (including their identity, unless they have elected to remain anonymous) being disclosed to the WPO so it can be addressed in accordance with this policy.

3.1.4. Other avenues of disclosure

Other than via any of the eligible avenues listed above, a whistleblower may also make a disclosure to:

i. A legal practitioner if the disclosure is made for the purposes of obtaining legal advice or legal representation about the operations of the whistleblower provisions under the Corporations Act 2001;
ii. Australian Securities and Investments Commission (ASIC);
iii. Australian Prudential Regulation Authority (APRA); or
iv. A journalist or parliamentarian for the purposes of making a public interest or emergency Disclosure.

A whistleblower who discloses tax avoidance behaviours can also make a disclosure to the Australian Taxation Office (ATO) if the information is considered useful in assisting the ATO perform its duties under a taxation law.

3.1.5. Public Interest or Emergency Disclosure

A public interest or emergency disclosure can be made where there has been a previous disclosure made in writing to either Australia Securities Investments Commission (**ASIC**) or Australian Prudential Regulatory Authority (**APRA**) or a Commonwealth authority and the whistleblower has reasonable grounds to believe that there is an imminent risk of serious harm or danger to public health or safety, or to the financial system, if the information is not acted on immediately. In the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure was made to ASIC, APRA or a Commonwealth authority.

The whistleblower must give the body to which the disclosure was made, a written notification that includes sufficient information to identify the previous disclosure and state that they intend to make a public interest or an emergency disclosure. A public interest or emergency disclosure can then be made to:

- A member of parliament, or
- A journalist working in a professional capacity for a newspaper, magazine, radio or television broadcasting service, or an electronic service that is operated on a commercial basis, which is similar to a newspaper, magazine or radio or television broadcast.

It is important for the individual to understand the criteria for making a public interest or emergency disclosure. The individual should contact an independent legal adviser or a person or entity specified above before making a public interest disclosure or an emergency disclosure.

4. How to make a disclosure

A person making a disclosure may choose to do so anonymously and the Bank will take all reasonable steps to protect their identity and will adhere to any statutory requirements in respect of the confidentiality of disclosures made. While we encourage people to share their identity when making a report it is not required. If the whistleblower does not share their identity, the disclosure will still be assessed as if the whistleblower had revealed their identity. However, there may be some practical limitations in conducting the investigation if the whistleblower has not shared their identity. In these circumstances, it is important that the whistleblower maintain ongoing two-way communication with the Bank, while remaining anonymous, to allow the Bank to ask any necessary follow-up questions. Where a whistleblower wishes to remain anonymous, the Bank will ensure the protection of the whistleblower's anonymity by:

i. ensuring all communication is via anonymous telephone hotlines or anonymised email addresses; and/or
ii. encouraging a whistleblower to adopt a pseudonym.

The Bank will not disclose the person's identity unless:

- They consent to the disclosure; or
- The disclosure is required or permitted by law.

Information received from a whistleblower via any of the above channels will be kept confidential to the extent possible. The Bank may be required to disclose the information received to appropriate regulatory authorities including the ASIC, APRA, the Australian Federal Police (**AFP**), or any other government agency.

5. Investigating Reportable Conduct

The investigation process will differ depending on the nature of the disclosure. The Bank may undertake a formal investigation, or a broad review or audit on the subject matter or the work area disclosed. The purpose of the investigation is to determine if the whistleblower concerns are substantiated, with a view to remedying any misconduct uncovered, where practical.

When a disclosure is made, the WPO will assess the disclosure and determine if the matter relates to Reportable Conduct and whether a formal investigation is required. If the matter is considered to meet the threshold of Reportable Conduct it will also be reported to the Chair of the Board Audit Committee.

Each disclosure will be assessed to determine whether it qualifies for protection under the Corporations Act 2001. In circumstances where it may be unclear whether the disclosure qualifies for protection, the Bank may treat the whistleblower as if they were protected as a whistleblower.

An investigator may be used to conduct an investigation and where necessary an external expert may also be engaged to assist. A person named in the disclosure will be given the opportunity to respond to the allegations. All investigations will be conducted in a fair, objective and independent manner and all reasonable efforts will be made to preserve the confidentiality of the whistleblower.

To avoid putting an investigation at risk, any disclosure made under this policy is required to be maintained as confidential (subject to any legal requirements). Depending on the subject matter of the complaint, the WPO, or an independent investigator will undertake the investigation.

If the whistleblower provides their contact details, feedback will be provided initially within a reasonable timeframe and then regularly whilst the investigation progresses. There may be circumstances where it may not be appropriate to provide updates to the whistleblower of the investigation outcome.

5.1. Outcome of Investigation

At the end of the investigation, the WPO, or the independent investigator, will finalise the findings and discuss them with the Chair of the Board Audit Committee. The matter will then be referred to the Board Audit Committee who will determine the appropriate response. This response may include rectifying any Reportable Conduct and taking any action required to prevent any future occurrences of the same or similar conduct.

The WPO will provide feedback, where appropriate, to the whistleblower regarding the process and outcome of, and actions arising from, any investigation.

Where issues of discipline arise, the response will also be in line with the Bank's procedures for disciplinary matters. Where allegations of unacceptable conduct made against another person cannot be substantiated, the outcome of the investigation will be advised to the relevant parties involved accordingly.

5.2. Support and Protection of Whistleblowers

A whistleblower will qualify for protection as a whistleblower under the Corporations Act 2001 if they are an 'eligible whistleblower' as defined by this legislation.

The Bank will ensure fair treatment of Employees mentioned in a disclosure made under this policy:

- To the extent that is practical and appropriate in the circumstances, handle all disclosures confidentially;
- Assess each disclosure on its merits and investigate as appropriate, in accordance with this policy;
- Advise an Employee who is the subject of a disclosure as and when required by principles of natural justice and procedural fairness, and where appropriate having regard to the nature of the disclosure
- Undertake any appropriate external actions, such as a referral to a regulatory or law enforcement agency;
- Advise when conduct raised in a disclosure, if proven, could lead to allegations of misconduct being made against an Employee the subject of the disclosure (including disciplinary proceedings up to and including termination of employment);
- Provide details of the persons who can be contacted with issues, queries, and concerns; and
- Advise the outcome of any investigation into the disclosure, in accordance with this policy without disclosing a copy of the investigation report or associated material.

Protections which are available to eligible whistleblowers include the following:

5.2.1. Civil, criminal and administrative liability

A whistleblower will not be subject to any of the following:

- Civil liability (for example, any legal action against the whistleblower for breach of an employment contract, duty of confidentiality or another contractual obligation);
- Criminal liability (for example, attempted prosecution of the whistleblower for unlawfully releasing information, or other use of the disclosure against the whistleblower in a prosecution (other than for making a false Disclosure); and
- Administrative liability (for example, disciplinary action for making a report that is covered by this policy, or for participating in any subsequent investigation).

However, this policy will not protect whistleblowers if the report is deliberately false or misleading.

5.2.2. Identity Protection (Confidentiality)

If the whistleblower chooses to disclose their name, every effort will be made to protect their identity.

Information about their identity and information that is likely to lead to their identification may be disclosed in the following circumstances:

- Where the information is provided to ASIC, APRA, ATO or the AFP;
- Where the information is disclosed to a legal practitioner for the purpose of obtaining legal advice in relation to the operation of applicable whistleblower protection laws; or
- Where the whistleblower provides consent.

Where a whistleblower does not give permission to share their identity, or share their identity with particular persons involved in managing or investigating the disclosure, for instance with the WPO or appointed independent investigator, the person receiving the disclosure will disclose the information contained in the disclosure **only if**:

- The information does not disclose the whistleblower's identity;
- They have taken all reasonable steps to reduce the risk that the whistleblower will be identified from the information; and
- It is reasonably necessary for investigating the issues raised in the disclosure.

It is illegal for a person to identify a whistleblower discloser or share any information that could lead to the identification of a discloser, outside of the above circumstances. The whistleblower can lodge a complaint about an actual or suspected breach of confidentiality by contacting the WPO, or by lodging a complaint with ASIC, APRA or the ATO for investigation.

In order to protect the confidentiality of a whistleblower, the Bank will ensure that:

- All personal information or reference to the whistleblower witnessing an event will be redacted;
- The whistleblower will be referred to in a gender-neutral manner;
- Where possible, the whistleblower will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them;
- Disclosures will be handled and investigated by qualified staff;
- All paper and electronic documents and other materials relating to disclosures will be stored securely;
- Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a whistleblower's identity (subject to the whistleblower's consent) or information that is likely to lead to the identification of the whistleblower;
- Communications and documents relating to the investigation of a disclosure will not to be sent to an email address or to a printer that can be accessed by other staff; and
- Each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a whistleblower's identity may be a criminal offence.

5.2.3. Protection from detrimental acts or omissions

A whistleblower will be protected from detrimental conduct, or threats of detrimental conduct, as a result of a person believing or suspect that the whistleblower (or another person) has made, may have made, proposes to make, or could make a disclosure. Examples of detrimental conduct include (but not limited to):

- Termination of employment;
- Alteration of an Employee's duties or position to their disadvantage;
- Injury of an Employee in their employment;
- Discrimination;
- A reduction in their terms and conditions of employment;
- Harassment or intimidation;
- Harm or injury to a person including psychological harm;
- Damage to a person's property;
- Damage to a person's reputation;
- Damage to a person's business or financial position; or
- Any other damage to a person.

In order to protect a whistleblower from detrimental acts or omissions, the Bank will ensure that:

- Processes for assessing the risk of detriment against a whistleblower and other persons (e.g. other staff who might be suspected to have made a disclosure), will commence as soon as possible after receiving a disclosure;
- Support services (including counselling or other professional or legal services) are made available to whistleblowers;
- Strategies to help a whistleblower minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation are made available;
- It has a procedure in place which outlines how a whistleblower can lodge a complaint if they have suffered detriment and the actions the Bank will take in response to such a complaint; and
- Any necessary adjustments or modifications are made to the whistleblower's role or workplace.

Retaliation in any form against an individual who reports misconduct under this policy (even if the report turns out to be mistaken) or who helps in the investigation of a report, will not be tolerated and will be treated as a breach of this policy.

The whistleblower will not be protected from actions that are not detrimental conduct. Examples of activities that are not detrimental conduct include management of unsatisfactory work performance, in line with Bank Policies, or actions that are undertaken to protect them from detriment – such as changing their usual work location.

If the whistleblower has made a disclosure regarding Reportable Conduct and believes they have been or are likely to suffer a detriment in any way by an Employee, including their manager, Director or third party because they have made a report, they should contact the Bank's WPO for assistance. The WPO has specific responsibilities including protecting those who raise a whistleblower concern under this policy.

Whistleblowers may also seek independent legal advice or contact a relevant regulatory body (such as ASIC, APRA or the ATO), if they think they have suffered detriment.

5.2.4. Compensation and other remedies

A whistleblower can seek compensation and other remedies through the courts if:

- they suffer loss, damage or injury because of a disclosure; and
- the Bank failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

In these circumstances, the Bank encourages them to obtain independent legal advice.

6. Support for Whistleblowers

We understand that raising a whistleblower concern can be stressful and difficult.

Whistleblowers are encouraged to make use of the confidential Employee Assistance Program counselling service available to all Bank Employees at any time.

They may also contact the WPO, who may appoint an independent support person to assist in managing their health and wellbeing. This action may require them to consent to disclosure of their identity, or information that could lead to the disclosure of their identity.

Anonymous whistleblowers will need to proactively report any adverse treatment if it is experienced by them, so the Bank can work with them to rectify actions taken against them.

7. Reporting and Escalations Process

Reports and escalations on whistleblower issues will be made to the CEO and the Chair of the Board Audit Committee within two business days and where required the Board.

The CEO, Audit Committee and the Board will receive a summary of disclosures made under this policy by the WPO at each Audit Committee meeting, including metrics on disclosures made and the types of issues raised.

These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this policy.

Any serious and/or material wrongdoing will be considered by the WPO for immediate referral to the Chair of the Board Audit Committee.

Where a report concerns the CEO, WPO, or a Director then such reports will be directed immediately to the Chair of the Board.

8. Access to this Policy

The Bank will make this policy available to all Officers and Employees of the Bank on the 360 intranet and Board portal.

9. Accountability and Training

The Executive will be accountable for championing the policy and the CPOO will be responsible for overseeing the implementation and effectiveness of the policy.

The CPOO will be responsible for arranging training as and when required.

10. Breach of Policy

Breaches of this policy will be regarded as misconduct, which may lead to disciplinary action.