

Whistleblowing Policy

Australian Addendum

***IMPORTANT** - This policy is an addendum to Travelex’s Global Whistleblowing policy, and should be read together with the Global policy when considering appropriate course of action.

This document summarises your rights and responsibilities for the reporting of misconduct, illegal, unethical or inappropriate activities (commonly referred to as ‘whistleblowing’). The purpose of this is to enable Travelex to comply with its legal and regulatory obligations and ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be supported.



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	Australia

1. Eligible Whistleblower

You are an eligible whistleblower under the Corporations Act 2001 Cth (as amended) if you are:

- an employee or former employee;
- an officer of the company (i.e. director or company secretary);
- a contractor or supplier (includes employees of the contractor or supplier) of services and goods to Travelex;
- an individual who is an associate of Travelex (as defined in the Corporations Act); and
- a relative, dependant or spouse of an individual referred to above.

2. Disclosable Matters

An eligible whistleblower can make a disclosure if there are reasonable grounds to suspect there has been misconduct (fraud, negligence, default or breach of duty and breach of trust) or an improper state of affairs. These are examples of types of activities that could and should be disclosed by whistleblowing:

- any criminal activity or serious misconduct by colleagues, customers or those with who Travelex has a business relationship (e.g. suppliers);
- any suspected fraud, false accounting, serious breach of controls or policies;
- any significant legal or regulatory breach;
- any danger to health and safety; or
- covering up or destroying evidence relating to any of the above.

A matter may also be considered a disclosable matter if the discloser has reasonable grounds to suspect that there has been a contravention of any of the following legislation:

- the *Corporations Act 2001*;
- the *Australian Securities and Investments Commission Act 2001*;
- the *Banking Act 1959*;
- the *Financial Sector (Collection of Data) Act 2001*;
- the *Insurance Act 1973*;
- the *Life Insurance Act 1995*;
- the *National Consumer Credit Protection Act 2009*;
- the *SIS Act 1993*;
- an instrument made under an Act referred to above; or
- an offence against any other Australian commonwealth legislation that is punishable by imprisonment for a period of 12 months or more.

Despite the above, eligible whistleblowers may make disclosures regardless of whether there has been a specific contravention of law, if the matter represents:

- a safety concern to the public;
- a concern to the financial stability, or confidence in the financial system;
- a material breach of documented internal policies; or
- any unethical behaviour not covered by the above laws.

Personal work-related grievances

Personal work-related grievances are **not** considered a disclosable matter under this policy. Personal grievances relate to an individual's employment or previous employment and having implications only on the individual. Examples of personal related grievances include:

- Personal conflicts within the workplace;

- Decisions concerning terms and conditions, promotion or termination;
- General workplace bullying disputes.
- Concerns relating to possible harassment,
- Perceived unfair treatment

Personal work-related grievances should be raised via the grievance procedure by contacting HR. A personal work-related grievance may still qualify for protection if the disclosure concerns misconduct or a contravention of a particular law and includes or is accompanied by a personal work-related grievance.

False or misleading disclosures

Obviously, it is wholly inappropriate to make any disclosures that are deliberately false or malicious. Any such conduct could constitute gross misconduct.

Anonymous disclosures

Disclosures can be made anonymously (e.g. by adopting a pseudonym and using anonymous email addresses and telephone numbers) and still be protected under the Corporations Act. A discloser can also remain anonymous during the course of an investigation and after the investigation is finalised. A discloser can also refuse to answer questions that they feel could reveal their identity, but should maintain communication with Travelex so that we can ask follow-up questions or provide feedback.

3. Making a Disclosure

A disclosure can be made by employees directly to the Head of HR ANZ. Alternatively, employees can contact the Travelex's Freephone Whistleblowing Phone Line if they prefer:

- **Australia 1800 151 062** – calls to this number will be answered by voicemail. Voicemail messages will be reviewed by Group Compliance and accordingly shared with Local Compliance and Head of HR for action.

External individuals / businesses, can make a disclosure by contacting Travelex's Whistleblowing Phone line as per above.

If you want to obtain additional information before making any disclosure, please contact the Head of HR ANZ or Head of Compliance & Risk ANZ.

4. Protections Available

Eligible whistleblowers have the right to legal protection from detrimental conduct. If you have made a disclosure under this policy, Travelex will ensure that the following protection measures are provided in line with the law:

- Identity protection and confidentiality;
- Employees will not be dismissed (unless the matter relates to a false disclosure);
- Employee's position or duty will not be altered;
- No harassment or intimidation;
- No action that would damage a person's property, reputation, business or financial position;
- No unlawful discrimination in any form towards an eligible whistleblower.
- Assessment of the risk of detriment to a discloser and mitigation; and
- Signposting support services such as the EAP.

Actions that are not detrimental conduct include administrative action that is reasonable for the purpose of protecting a discloser from detriment or managing a discloser's satisfactory work performance in line with Travelex's performance management framework.

The confidentiality of a discloser's identity will be protected by Travelex redacting personal information or references to the discloser witnessing an event and by referring to the discloser in a gender-neutral context. In addition, where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them. All documents and other materials relating to a disclosure will be stored securely and access restricted to those managing and investigating the disclosure.

Disclosures that are not about "disclosable matters" (as described above) do not qualify for protection under the Corporations Act (or the Taxation Administration Act, where relevant), although such disclosures may be protected under other legislation. The protections can still apply, however, where the discloser has reasonable grounds to suspect misconduct or an improper state of affairs or circumstances, but the disclosure turns out to be incorrect.

If an eligible whistleblower believes that the above protection was not provided during the course of their investigation and there has been loss, damage, injury or any other detriment, they have the right to seek further compensation or remedy through civil action.

Travelex will not take legal action against eligible whistleblowers purely because a disclosure was made. Individuals / businesses are protected from civil, criminal (unless the matter relates to a false disclosure) and administrative liability. These protections do not grant immunity for any misconduct a discloser has engaged in that is revealed in the disclosure.

5. Investigation process

Once a disclosure has been made, either directly or via Travelex's Freephone Whistleblowing Phone Line, the discloser will usually be contacted or acknowledged no later than 48hrs after making the disclosure.

Where the discloser wishes it, HR will arrange for a confidential discussion with the discloser. From the first discussion, HR will determine if the discloser is an eligible whistleblower and if the issue is a 'disclosable matter'. If these criteria cannot be met, the discloser will formally be advised that the matter cannot be dealt with under this policy.

If a discloser is deemed an eligible whistleblower and the reported matter is a 'disclosable matter', HR will continue the investigation process and arrange for discussions with all concerned parties.

Initial discussions with the concerned parties will be confidential and the discloser's identity will not be revealed. However, where the information in the disclosure could identify the individual, Travelex will seek consent from the discloser before transmitting or investigating the disclosure internally. If informed consent is not provided, Travelex may still communicate the disclosure / reveal the identity if it is reasonably necessary for investigating the issues raised in the disclosure and Travelex has taken all reasonable steps to reduce the risk that the discloser will be identified from the information. It is illegal for a person to identify a discloser without their consent, or transmit information likely to lead to the identification of a discloser, outside of these limited circumstances (unless the disclosure is to ASIC, APRA, a member of the Australian Federal Police, a legal adviser or a prescribed person or body).

After the completion of the investigation, the eligible whistleblower will be advised of the outcome and remedy steps that will be taken by Travelex if any. The protections referred in this policy continue to apply after completion of the investigation.

The full investigation process will be completed within 90 days from the initial disclosure. Regular updates will be provided during this process.

If a discloser has not received a response within 90 days and does not have reasonable grounds to believe that action is being or has been taken to address the matters to which the first disclosure related, a public interest disclosure can be made to a journalist or parliamentarian.

The outcome of the investigation will be reported to Global Compliance & Risk. However, confidentiality will be preserved.

6. Fair Treatment and Support

To ensure fair treatment, Travelex confirms that:

- disclosures will be handed confidentially;
- individuals / businesses will be advised of the investigation process and expected response time;
- investigations will not be conducted by a line manager or concerned individual;
- employee counselling will be provided if requested; and
- disclosers will continue to be treated fairly and as per normal within their daily interactions with Travelex.

In addition, Travelex will ensure the fair treatment of any employees mentioned in a disclosure. Where an investigation is required it will be handled in an objective, fair and independent manner in order to determine whether there is sufficient evidence to substantiate or refute the matters reported.

7. Eligible recipient

It is recommended that matters are disclosed to the Head of HR or via Travelex's Whistleblowing Phone line. However, if a matter has been disclosed to an eligible recipient, the matter may qualify for protection under this policy. Eligible recipients include:

- an officer (i.e. director or company secretary), or senior manager of the body corporate (or related body corporate). A senior manager is someone who makes, or participates in making decisions that affect the whole, or a substantial part, of the business;;
- an auditor, or member of an audit team conducting an audit of the body corporate (or related body corporate);
- an actuary of the body corporate (or related body corporate); and
- a person authorised by the body corporate to receive disclosures that may qualify for protection.

Eligible recipients (not formerly authorised to receive disclosures) who have received a disclosure must refer the individual / business to this policy and to make the disclosure through Travelex's recommended disclosure channel. If the discloser does not wish to go through the recommended channel, it is necessary for the eligible recipient to seek informed consent from the discloser to notify the Head of HR so that the formal investigation process may commence.

In addition, disclosures may be made to ASIC, APRA, and other prescribed Commonwealth authorities. Disclosures can also be made to legal practitioners for the purposes of obtaining legal advice or representation regarding whistleblowing.

In certain circumstances, a public interest disclosure or an emergency disclosure can be made to a parliamentarian or journalist and qualify for protection. A public interest disclosure can only be

made where the eligible whistleblower has reasonable grounds to believe that making a further disclosure of the information is in the public interest. Emergency disclosures can only be made where the eligible whistleblower has reasonable grounds to believe that the information disclosed concerns a substantial and imminent danger to health or safety of one or more persons, or the natural environment. For public interest and emergency disclosures, there must have previously been a disclosure made to ASIC, APRA or a prescribed body and written notice provided to the body to which the disclosure was made. Also, in the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure. There are a number of other criteria to satisfy and it will be important for a discloser to understand the full criteria for making a public interest or emergency disclosure. A discloser should also contact an independent legal adviser before making either of these disclosures.

8. Access to this Policy

This policy can be accessed via Travelex's intranet page (Lounge). This policy will also be available on Travelex's online webpage.