

# Whistleblower Policy

<b>Document Owner:</b>	Group Executive Legal & External Affairs and Company Secretary
<b>Approved by:</b>	TPG Telecom Audit and Risk Committee
<b>Document Custodian:</b>	Legal and External Affairs
<b>Version Number:</b>	4
<b>Date Approved:</b>	13 September 2024
<b>Effective Date:</b>	20 February 2025
<b>Next Review Date:</b>	13 September 2026

## 1. Purpose

TPG Telecom is strongly committed to fostering a culture where you feel safe to speak up about matters that concern you. As part of TPG Telecom's culture of openness, integrity and accountability, we encourage you to speak up if you observe or suspect any improper conduct. This Whistleblower Policy (the **Policy**) outlines how you can make a report, how we investigate and deal with improper conduct, and how we will support and protect you throughout this process.

## 2. Scope

This Policy applies to all people in the TPG Telecom Limited group of companies (**TPG Telecom**) and a reference to TPG Telecom is a reference to each company within the TPG Telecom group of companies. The Policy also applies to all other eligible whistleblowers as outlined within this Policy.

TPG Telecom policies are not contractual in nature and TPG Telecom may amend, replace or withdraw its policies from time to time, in its sole discretion. Employees should read the policies in conjunction with their employment contract or any applicable industrial instrument and the applicable law.

## 3. Reporting improper conduct

For the purposes of this Policy, improper conduct is the conduct of anyone connected with TPG Telecom which in your reasonable view may amount to misconduct, wrongdoing or an improper state of affairs. This includes any conduct that involves:

- dishonest or unethical behaviour;
- fraudulent activity;
- illegal, corrupt, inappropriate or irregular practices or activities;
- any behaviour which creates an unsafe work-practice (e.g. which poses a serious risk to the health/safety of anyone in our workplace);
- serious or systemic instances of harassment, discrimination or bullying;
- breach of the *Privacy Act 1988* (Cth) or TPG Telecom Privacy Policy for employees;
- unauthorised disclosure of confidential information;
- serious risk to public health, public safety, the environment or a financial system;
- any activity which may significantly damage TPG Telecom's reputation;
- any other conduct which may cause significant loss (whether financial or non-financial) to TPG Telecom;
- an offence against or contravention of the *Telecommunications Act 1997* (Cth), the *Telecommunications (Interception and Access) Act 1979* (Cth), the

*Competition and Consumer Act 2010 (Cth)*, legislation as specified by ASIC<sup>1</sup> and any other law of the Commonwealth that is punishable by imprisonment of 12 months or more;

- any attempt to conceal any of the above.

## 4. What reports or disclosures are not covered?

### 4.1. Personal work-related grievances

This Policy does not apply to any personal work-related grievances. A personal work-related grievance is a grievance about any matter in relation to your employment or former employment having (or tending to have) implications for you personally, which may include:

- an interpersonal conflict between you and another employee;
- a decision relating to your engagement, transfer or promotion;
- a decision relating to the terms and conditions of your engagement; and
- a decision to discipline you or to suspend or terminate your engagement due to the way you performed your role.

We will let you know if your concern constitutes a personal work-related grievance which falls more properly within TPG Telecom's Grievance Handling Guidelines. Such concerns should be directed to your line manager or Human Resources business partner.

### 4.2. False disclosures

You must have reasonable grounds to suspect that improper conduct has occurred. This Policy will only apply to genuine claims and reports. TPG Telecom takes deliberately or maliciously false reports very seriously and disciplinary action may follow.

## 5. Reporting improper conduct

### 5.1. Who can report improper conduct?

You may report improper conduct under this Policy if you currently are, or have been, any of the following with respect to TPG Telecom:

- an employee (whether permanent, fixed term or casual);
- a director;
- an officer;

---

<sup>1</sup> The specified Acts include the following (or instruments made under them): *Corporations Act 2001 (Cth)* (**Corporations Act**), *Australian Securities and Investments Commission (ASIC) Act 2001 (Cth)*, *Banking Act 1959 (Cth)*, *Financial Sector (Collection of Data) Act 2001 (Cth)*, *Insurance Act 1973 (Cth)*, *Life Insurance Act 1995 (Cth)*, *National Consumer Credit Protection Act 2009 (Cth)*, *Superannuation Industry (Supervisions) Act 1993 (Cth)*.

- a supplier of goods or services (whether paid or unpaid) including TPG Telecom’s dealers;
- an employee of a supplier;
- a consultant; and
- a relative, dependent, spouse (including a dependent of a spouse) of any of the above (together, *the eligible whistleblowers*).

The protections under this Policy will also apply to you if you have reported any improper conduct to a legal practitioner to obtain legal advice or representation in relation to the whistleblower protection laws.

### 5.1.1. Internal reporting for employees

You may report improper conduct and raise your concerns with the following people:

Eligible Recipients	Reportable matters
Head of Workplace Health and Safety	Occupational Health & Safety matters
Your Human Resources Business Partner	Matters of discrimination, harassment or breach of TPG Telecom policies
General Manager – Technology Security/General Manager – Corporate Security	Information security matters
Whistleblower Protection Officer (General Manager, Corporate Security) (the <b>WPO</b> )	All matters
General Manager or Executive	All matters
Board directors	All matters
External auditors conducting an audit of TPG Telecom or its related entities; and head of TPG Telecom’s internal audit team	All matters subject to the audit

Internal reports may be made either in writing, by telephone or in person. An eligible recipient may report or direct you to make the report to the WPO at **wpo@tpgtelecom.com.au** or the external whistleblower service (see below) if they consider it appropriate in the circumstances.

### 5.1.2. Internal reporting through the Speak Up Platform (Whispli)

Eligible whistleblowers may also report improper conduct internally through Speak Up - a secure platform hosted by Whispli. The Speak Up platform enables whistleblowers to report anonymously (if you chose to do so) and your identity will be protected. You can access Speak Up by scanning the below QR code.



### 5.1.3. External reporting

If you do not feel comfortable reporting the matter internally, or where you have previously reported an issue and believe that no action has been taken, or if you wish to remain anonymous, you may contact our external independent whistleblower service, KMPG FairCall, using any of the following methods:

- calling the hotline number 1800 500 965, which is operational for calls made in Australia and India;
- via a secure online facility at <https://www.kpmgfaircall.kpmg.com.au/TPGTelecom>; or
- by post to The FairCall Manager, KPMG Forensic, PO Box H67, Australia Square, Sydney NSW 1213.

Please note that the operators of this external reporting service are not associated with TPG Telecom. They are trained, experienced specialists dedicated to dealing with these matters. The external operator will prepare a report which details your reported improper conduct which will then be forwarded to the WPO.

We will keep all information contained in these reports confidential except where we are required by law or where we are required to disclose to regulatory authorities, law enforcement agencies or our professional advisers.

### 5.1.4. Anonymous reporting

If requested, each whistleblower who uses this external service will be provided with a confidential reference number to facilitate subsequent communication on an anonymous basis. External reports made in this way may be made anonymously. In cases where you have not consented to the disclosure of your identity, the matter may still be referred for investigation, in which case the investigator will take all reasonable steps to reduce the risk that you will be identified.

## 6. Investigations

### 6.1. How reported matters will be handled

TPG Telecom will examine improper conduct that has been reported under this Policy and determine what action will be taken (this may involve an internal enquiry or a more formal investigation). You will be told who is handling the matter, how you can contact them and whether any further assistance is required from you. We will do our best to keep you updated on the progress of an investigation if we are able to in the circumstances.

## 6.2. Fair treatment

Where an investigation is undertaken, it will incorporate the following principles of procedural fairness:

- Where the WPO considers that a formal investigation should be carried out, the WPO will either appoint an independent internal or independent external investigator to investigate the report of improper conduct. In selecting an appropriate investigator and in order to ensure their independence, the WPO will take into account the following:
  - the nature of the allegations and the scope of the investigation required; and
  - the skills, experience and knowledge of the investigator.
- Further, the investigator and ultimate decision maker shall have no direct involvement in the alleged incident or have a conflict of interest in relation to the matters raised;
  - Prompt action and transparent communication in relation to the investigation and subsequent decisions.
  - Support for the accused should they choose to respond to the allegations in person;
  - Confidential information regarding the investigation should only be communicated on a need- to-know basis and all efforts should be made to ensure such details remain confidential;
  - Records will be maintained of meetings and interviews, including details of those who attended and the agreed outcomes;
  - All relevant evidence will be lawfully obtained and carefully considered; and
  - Investigation findings and recommendations may be documented in a written report.

## 6.3. If concerns are raised about you

Each named individual will be given the opportunity to be part of the investigation and to respond to any allegations made against them, prior to any adverse decisions being made internally.

## 6.4. Investigation findings

The investigation may conclude with a report prepared by the Investigator. The report will include findings on the allegations and a summary of reviewed evidence. If permitted by law, the WPO may inform the individual(s) against whom allegations have been made of the findings. All reports and meeting records will remain the property of TPG Telecom and will not be shared with you or any person against whom allegations have been made.

Where possible, the whistleblower will be informed of the outcome of the investigation, subject to any privacy, regulatory or confidentiality considerations.

## 7. Protections

### 7.1. Protections under the Corporations Act

You may also be covered by certain protections under the Corporations Act if you report on disclosable matters to an Eligible Recipient, a relevant regulator (such as the ASIC), another permitted external recipient, such as KMPG FairCall, or your lawyer (for the purpose of obtaining legal advice or representation).

Disclosable matters include matters where you have reasonable grounds to suspect that certain information indicates that an employee or officer of TPG Telecom or its related entities has engaged in improper conduct.

Protections available for eligible whistleblowers include:

- identity protection and confidentiality;
- protection against civil, criminal and administrative liability;
- protection from any contractual or other remedy being enforced against you because of your disclosure; and
- protection against personal disadvantage, including, but not limited to:
  - dismissal, suspension or demotion;
  - any form of harassment or victimisation, including being threatened;
  - damage to your property, reputation or financial position; and
  - discrimination.

You may also seek compensation and other remedies if you suffer loss or damage as a result of making a report.

### 7.2. Protection against personal disadvantage

The Corporations Act and this Policy prohibits any detrimental act or omission being taken against you because of your report.

After you have made a report, the WPO will assess whether any additional measures should be put in place to protect you from detrimental acts or omissions.

These measures will be assessed on a case-by-case basis, but could include:

- enabling you to perform your duties remotely if you are an employee;
- reassigning you to another role at the same level;
- providing you with support services; or
- allowing you to take leave.

If you have reported improper conduct under this Policy and consider that action has been taken either against you, your colleagues, or your relatives which results in you or the individual(s) becoming personally disadvantaged, please contact the WPO. The WPO will consider the circumstances and will take steps to remedy or address any personal disadvantage that you have experienced as appropriate.

You may also seek independent legal advice or contact regulatory bodies, such as ASIC, if you believe that you have suffered personal disadvantage as a result of making a report of improper conduct under this Policy and the matter has not been resolved internally.

However, the protections will not apply to the extent that:

- Your disclosure is not a disclosable matter covered by the *Corporations Act*, such as a report about a personal work-related grievance; or
- you yourself have taken part in any improper activities. Any employee or contractor found to have engaged in such activities will be in breach of this Policy and the TPG Telecom Code of Conduct and will be subject to disciplinary action, which may include termination of employment.

You are not required to prove your allegations, but you must have reasonable grounds to suspect that the improper conduct has occurred. You can still qualify for protection even if your report turns out to be incorrect.

### 7.3. Confidentiality

All information we receive from you under this Policy will be treated as confidential. TPG Telecom will not disclose this information without your express consent unless it is:

- as part of the investigation process;
- required by law, for example if it is required by the Australian Federal Police;
- to a legal practitioner for the purposes of obtaining legal advice or representation; or
- to Australian Securities & Investments Commission (ASIC).

Our People are prohibited from revealing your identity or revealing details that could lead to you being identified, unless they have obtained your express consent. All reasonable steps will be taken to reduce the risk of identifying you without your permission. Should your identity, or information leading to your identity be disclosed during an investigation, it is expected that it is kept confidential by all parties.

If you choose to make a disclosure anonymously, you will still be eligible for the



protections under the Corporations Act

#### 7.4. Public interest / emergency disclosures

In some instances, you may make a public interest disclosure or an emergency disclosure directly to a journalist or a member of a State, Territory or Federal Parliament. There are strict guidelines under the relevant laws as to what, when and how you can disclose. Protections under this Policy will only apply if you have satisfied all requirements set out below for the relevant type of disclosure:

Public interest disclosure	Emergency disclosure
You have reasonable grounds to believe that making a disclosure would be in the public interest (e.g. if you're aware of an electrical fault in equipment that may harm members of the general public).	You have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment (e.g. if your disclosure is vital to preventing a disaster that will affect the wider community).
You have made a prior disclosure of the disclosable matter to ASIC, APRA or another Commonwealth authority ( <b>Govt Authority</b> ).	You have made a prior disclosure of the disclosable matter to ASIC, APRA or another Commonwealth authority ( <b>Govt Authority</b> ).
You have notified TPG Telecom in writing: a) that you will make a public interest disclosure; and b) identifying the prior disclosure.	You have notified TPG Telecom in writing: a) that you will make a public interest disclosure; and b) identifying the prior disclosure.
You do not disclose more information than is necessary in the public interest disclosure to inform the relevant recipient of the improper conduct.	You do not disclose more information than is necessary in the public interest disclosure to inform the relevant recipient of the improper conduct.
At least 90 days have passed since your prior disclosure.	Not applicable.
You do not have reasonable grounds to believe that action is being or has been taken to address the matter you disclosed.	Not applicable.

We recommend that you seek independent legal advice regarding your rights before proceeding with making a public interest disclosure or emergency disclosure.

## 8. Support when raising concerns

Employees will have access to the following support in addition to your protections under this Policy:

- the Employee Assistance Program; and
- assistance from your Human Resources Business Partner or an independently appointed member of the human resources team to deal with any ongoing concerns.

## 9. Breaches

Any breach of this Policy will be taken very seriously and may result in disciplinary action, which may include termination of employment. If a breach of this Policy also breaches the Corporations Act, the individual(s) involved and the company may also be liable for penalties including significant fines and/or imprisonment. TPG Telecom is unable to ensure immunity of any individual from prosecution in the criminal jurisdiction.

## 10. Conflicts of interest

Where a report under this Policy concerns a director, employee, or contractor of TPG Telecom in any way, the individual must not be involved in the investigation process or any decision-making relating to the matter.

If a report concerns the WPO, the WPO has a conflict of interest in relation to the matter or the WPO is otherwise unavailable, then the General Manager Risk & Audit Finance will act as the alternate WPO. Policy Availability

This policy will be available for all TPG Telecom employees to view on the intranet. To ensure it is available to all eligible whistleblowers, the Policy will also be available on TPG Telecom's corporate website.

## 11. Policy Review

TPG Telecom undertakes to review this Policy and related procedures regularly for effectiveness and compliance with the Act. At a minimum, this Policy shall be reviewed bi-annually.

## 12. References

<b>Associated Documents and Policies</b>	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Supplier Code of Conduct</li> <li>• Equal employment opportunity (EEO), anti-harassment &amp; bullying policy</li> </ul>
<b>External References &amp; Regulatory Obligations</b>	<ul style="list-style-type: none"> <li>• Corporations Act 2001 (Cth)</li> <li>• ASIC Regulatory Guide 270</li> </ul>

## 13. Document Control

Version	Date	Pages Affected	Description	Prepared by	Reviewed by	Approved by
1.0	30/06/2020			Chief Security Officer		Trent Czinner
2.0	29/03/2021			Chief Security Officer		Trent Czinner
3.0	4/12/2023		Updates to whistleblower protection mechanisms to ensure alignment with the ASIC Regulatory Guide 270	General Counsel and GM Corporate Security	Trent Czinner	ARC
4.0	13/09/2024		Administrative change to include details of new Speak Up Platform for internal reporting	General Counsel and GM Corporate Security	Trent Czinner	To be noted at the next ARC meeting