



Great
Southern
Bank

Whistleblower Policy

Helping all Australians own their own home

Frequency of review:	Biennial
Date of approval:	April 2021
Resolution Number:	BD2020-04
Approving Body:	Board
Scope:	Group

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1. Purpose

Great Southern Bank is committed to the highest standards of conduct and ethical behaviour in all our business activities and to promoting and supporting a culture of honest and ethical behaviour in line with our KCAs, and good corporate governance.

Great Southern Bank encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct and provides protections so that those who make a report may do so confidentially and without fear of intimidation or reprisal.

2. Scope

The Whistleblower Policy provides an avenue for the following whistleblowers:

- (a) Great Southern Bank team members (including directors and officers) and former team members;
- (b) Any entity (or their employees) who supply goods and services to any Great Southern Bank group entity;
- (c) Anyone who is an associate of any Great Southern Bank group entity;
- (d) Anyone who is a relative of someone described in (a) – (c)
- (e) A dependant of someone who is:
 - o described in (a) – (c); or
 - o a spouse of someone described in (a) – (c)

to raise serious concerns with reassurance there will be no disadvantage for whistleblowing. Disclosures may be anonymous.

3. Exceptions

There are to be no exceptions with the compliance of this Policy.

4. Policy Approvers / Frequency of Review

4.1. Approvers

4.1.1. The approver of this Policy is the Great Southern Bank Board.

4.1.2. Legislative/Regulator requirement for Board approval of this Policy:

Yes: No: .

4.1.3. The Board will approve this Policy on behalf of each Group Company to the extent that it is applicable to them.

4.2. Review

4.2.1. Legislative/Regulator stipulated review period for this Policy:

Yes: No: .

4.2.2. This Policy will be reviewed at least biennially or as required subject to legislative or regulatory requirements, in order to ensure:



- (a) Currency, relevance and accuracy; and
- (b) It continues to meet the needs, strategic imperatives and cultural alignment intentions of the Group

4.2.3. To ensure the Policy remains fit for purpose, the Policy Owner can make the following changes to the Policy without Board approval:

- (a) grammatical/spelling errors
- (b) Minor wording amendments to align to the Group's strategic direction and Purpose
- (c) Amendments to diagrams throughout the Policy and Appendices

5. Policy Owner

The owner of this Policy is the Chief People Officer.

6. Distribution

This Policy will be made available to all Directors, Officers and team members. Additionally, the Policy will be available on Great Southern Bank's website for external stakeholders and interested parties.

7. Policy Statements

What is reportable conduct?

Under this policy you may make a report if you have reasonable grounds to suspect that a Great Southern Bank director, officer, team member, contractor, supplier or other person who deals with Great Southern Bank has engaged in conduct which:

- Is dishonest, fraudulent or corrupt;
- Is illegal activity;
- Is unethical or in breach of Great Southern Bank policies, standards or guiding principles;
- May cause damage to Great Southern Bank, a team member, or a third party such as unsafe work practices, health risks or abuse of Great Southern Bank's property;
- Constitutes an abuse of position;
- May cause financial loss to Great Southern Bank, damage our reputation or be in general detrimental to Great Southern Bank's interests;
- Involves harassment, bullying, victimisation; or
- Involves any kind of misconduct or improper circumstances.



Personal, work related grievances are not included within this Whistleblower Policy framework. Examples of this include interpersonal conflict between the whistleblower and another team member.

Who can I make a report to?

Great Southern Bank has several channels available for reporting issues or concerns. For the purpose of this policy to ensure appropriate escalation and timely investigation, we request that reports are made to any of our Whistleblower Protections Officers or Senior Leader as identified below:

- General Counsel
- Chief People Officer
- Company Secretary
- Chief Financial Officer

Whistleblowers may also make disclosures to:

Any Board member, Executive or Senior Leader at Great Southern Bank.

Whistleblower complaints can also be made via 'Great Southern Bank's external provider whose details are available on Great Southern Banks Intranet/Internet and Schedule 1 of this policy. The external provider is a third-party provider who will receive the complaint and escalate according to Great Southern Bank's Policy.

The supplier will provide the details of the disclosure to a Whistleblower Protections Officer. Reports may be anonymous, however, if you do provide your contact details they will only be provided to the Whistleblower Protections Officer with your consent.

Note: Anonymous complaints raised to a Great Southern Bank's officer or senior leader will be managed as per the Whistleblower Policy.

Investigation of reportable conduct

Great Southern Bank will investigate all matters reported as soon as practicable after the matter has been reported. A Whistleblower Protections Officer may appoint a person to assist in the investigation of a report. Where appropriate Great Southern Bank will provide feedback on the investigation's progress or outcome subject to considerations of privacy. Each investigation will be conducted in a fair and objective manner even though the process of each case will be determined by the particulars of the matter. Once reported, a Whistleblower Protections Officer or investigator will contact the reporter to discuss the investigation process. Where a report is made anonymously Great Southern Bank will conduct the investigation based on the information provided.

Protection of whistleblowers

Great Southern Bank is committed to ensuring confidentiality in respect to all matters raised under this policy and those that do make a report are treated fairly and experience no detriment.

In particular, Great Southern Bank will ensure that the whistleblower does not suffer the following detriments as a result of making the Disclosure:

- Dismissal
- Demotion
- Any form of harassment or victimisation
- Discrimination
- Current or future bias
- Damage to reputation, business or financial position
- Prosecution



If you are subjected to detrimental treatment as a result of making a report under this policy, you should inform a Whistleblower Protections Officer or senior leader within your relevant division/business unit immediately under the Whistleblower Policy.

Anonymity

The whistleblower may or may not wish to remain anonymous, and Great Southern Bank will guarantee the protection of identity to the extent of the law.

Temporary relocation or leave of absence

In the rare event that the whistleblower's identity cannot remain anonymous due to the nature of the investigation, the whistleblower may also seek temporary workplace relocation or a leave of absence during the investigation.

Requests for relocation should be made to the Whistleblower Protection Officer, who will then make all reasonable efforts to accommodate the request, with consideration to business requirements.

Appeals

If the whistleblower believes that they have not been provided with the appropriate protection throughout this process, then they may appeal directly to the Whistleblower Protections Officer for independent review of the allegations and process. If deemed relevant escalation may be up to GREAT SOUTHERN BANK's Chair.

All information and reports to be kept confidential and secure at all times to the extent of the law.

Investigation Officers

Investigative Role	Incumbent/s
Whistleblower Protections Officer	Whistleblower Protection Officer shall be the General Counsel supported by the Chief People Officer, unless the matter relates to him/her or to a Great Southern Bank Director in which case the CEO will assume the protection responsibility. Other Protections Officers include the Company Secretary and the Chief Financial Officer.
Whistleblower Investigations Officer	Whistleblower Investigations Officer shall be the Chief People Officer unless the matter relates to him/her in which case the CEO will assume the investigation responsibility.
Great Southern Bank Officers	Individual officers, Risk, IT, Fraud teams.

Whistleblower procedure for investigation of disclosures

Step	Description	Detailed Actions	Responsible person/s
1	Whistleblower raises whistleblower disclosure	A whistleblower disclosure is made via one of the below avenues: Whistleblower Protections Officers Any Board member, Executive or senior leader at Great Southern Bank Note: Anonymous disclosures raised to a Great Southern Bank team member (generally P&C) will be managed as per the Whistleblower Procedure.	External Provider Protections Officer Senior Leader Executive



Step	Description	Detailed Actions	Responsible person/s
2	Collection of concern raised	<p>Disclosure may be received via phone, email, face to face, or postal channels.</p> <p>Provide notification of receipt to whistleblower and forward disclosure to Whistleblower Investigations Officer and Whistleblower Protections Officer.</p> <p>If the disclosure is about the Whistleblower Protections or Investigations Officer, then the disclosure is to be dealt with by Great Southern Bank CEO.</p>	Whistleblower Investigations Officer or alternate as delegated including external resources
3	Assessment of concern raised	<p>Thorough and impartial assessment of concern, including examining evidence, determining the extent of the Disclosure, investigation strategy and interviewing parties involved.</p> <p>This process will follow Great Southern Bank Grievance Procedure and may involve suspension from duty where gross misconduct and/or incidents of a serious nature are involved. At times it may be deemed appropriate to engage an external investigator.</p>	Whistleblower Investigations Officer
4	Feedback to Whistleblower	<p>Except where the whistleblower is anonymous, feedback and support to the whistleblower will be provided.</p> <p>All information and reports to be kept confidential and secure at all times to the extent of the law.</p>	Whistleblower Protections Officer
5	Public interest disclosure	<p>If after 90 days of making the Disclosure, the whistleblower does not reasonably believe that action is being taken to address the matters that are Disclosed, and the whistleblower reasonably believes that it is in the public interest to make the disclosures public, the whistleblower will give written notice to the Whistleblower Protections Officer that sets out the Disclosure and that the whistleblower intends on making a Public Interest Disclosure. The whistleblower may then make a public interest disclosure to a member of Parliament or to a journalist.</p>	Whistleblower Protections Officer
6	Emergency disclosure	<p>The whistleblower may also make an Emergency Disclosure to a member of parliament or journalist (without 90 days having elapsed) if:</p> <ul style="list-style-type: none"> the Disclosure is in relation to a matter which the Discloser reasonably believes concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and the Discloser has provided written notice to the body to which the previous disclosure was made that provides sufficient information to identify the previous disclosure and states that 	Whistleblower Protections Officer



Step	Description	Detailed Actions	Responsible person/s
		the discloser intends to make an emergency disclosure.	
7	Investigative assistance	To properly investigate, assistance may be required from other Great Southern Bank Officers who aren't under investigation or involved. Confidentiality applies to any officers involved. This may include but is not limited to: individual officers, IT, risk or fraud teams and external specialist investigation officers.	Whistleblower Investigations Officer
8	Notify necessary parties	The CEO, and where appropriate, the Board and/or the Audit or Risk Committee will be provided with the progress and outcome of the disclosure and investigation, including quarterly reporting to the Board Remuneration Committee and Board.	Whistleblower Investigations Officer
9	Outcomes	Appropriate action will be initiated dependant on the outcome of the review. This may include notifying regulators, P&C disciplinary action and/or referral to a third party.	Whistleblower Investigations Officer
10	Assessment found to be false or misleading	Where it is shown that a person claiming to be a whistleblower has deliberately made a false report, then this action will be considered a serious matter. If this is the case then the Whistleblower will not receive immunity from disciplinary proceedings.	Whistleblower Investigations Officer supported by Whistleblower Protections Officer

8. Policy Compliance Measures

Compliance with this Policy will be measured and reported through the People & Culture function and escalated as required.

9. Terms and Definitions

The following terms contained in this Policy are defined as follows:

Term	Definition
Senior leader	A leader within Great Southern Bank who has significant impact either in a decision making capacity or financial impact. Usually a senior leader will be a Level 4 leader or a leader who reports directly to an executive.
Reportable matter	Disclosure includes conduct by a person or persons, which in the reasonable view of the Whistleblower is: a. a contravention of one of the legislation set out in Schedule 1 b. dishonest,



Term	Definition
	<p>c. fraudulent (includes activity causing actual or potential financial loss including theft, deliberate falsification, concealment, destruction or use of falsified documentation, or the improper use of information or position),</p> <p>c. corrupt; includes activity where the acts are contrary to the interests of Great Southern Bank and abuses their position of trust in order to achieve some personal gain or advantage for themselves or others,</p> <p>e. illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property),</p> <p>f. in breach of government legislation,</p> <p>g. unethical,</p> <p>h. activity where the person/s acts contrary to the interests of Great Southern Bank and abuses their position of trust in order to achieve some personal gain or advantage for themselves or others</p> <p>i. an unsafe work-practice,</p> <p>j. substantial mismanagement of resources,</p> <p>k. any other serious improper conduct which may cause financial or non-financial loss to Great Southern Bank or be otherwise detrimental to the interests of Great Southern Bank, or</p> <p>l. a matter involving information about accounting, internal control, compliance, audit and other matters about which the team member has concerns as referenced in APRA Prudential Standard CPS 510 Governance, paragraph 110.</p>
Whistleblower	<p>An eligible whistleblower is a current or former:</p> <ul style="list-style-type: none"> • Officer • Team member • Contractor for the supply of goods or services, either paid or unpaid together with their employees • Relatives of those referred to above • Dependants or individuals referred to above including a spouse
Protected disclosure	<p>For a disclosure to qualify for protection it must be:</p> <ul style="list-style-type: none"> • Made by an eligible whistleblower • A reportable matter
Public interest disclosure	<p>If the conditions as set out in the Whistleblower Procedure are met, public disclosure may be made to:</p> <ul style="list-style-type: none"> • A member of parliament; or • A journalist
Emergency disclosure	<p>An emergency disclosure may be made if the conditions as set out in the Whistleblower Procedure are met.</p>
External Provider	<p>Great Southern Bank engages the services of an external supplier of whistleblowing programs and related hotline and investigation services. They provide a highly confidential service for any team member, supplier, customer or other eligible whistleblower to anonymously report suspected or actual wrongdoing. The details of Great Southern Bank's provider are found on our Inter/Intranet and in Schedule 1 of this policy.</p>

10. Document Control

Contact for enquiries and proposed changes

Name: Ruth Buchanan



Role: P&C Manager
 Phone: 07 3552 4463
 Email: Ruth.buchanan@gsb.com.au

Document History

Group Entity	Approval Date	Ver No.	Summary of Changes	Policy Author	Commencement Date
Great Southern Bank		1	New Policy required by legislative changes	Ruth Buchanan	1 July 2019

Document Location

<http://infocentral.GreatSouthernBank.com.au/governance/policies,-standards-and-key-documents>

References to this Policy

Legislation	<p>The Corporations Act;</p> <ul style="list-style-type: none"> (ii) the ASIC Act; (iii) the <i>Banking Act 1959</i>; (iv) the <i>Financial Sector (Collection of Data) Act 2001</i>; (v) the <i>Insurance Act 1973</i>; (vi) the <i>Life Insurance Act 1995</i>; (vii) the <i>National Consumer Credit Protection Act 2009</i>; (viii) the <i>Superannuation Industry (Supervision) Act 1993</i>; (ix) an instrument made under an Act referred to in any of subparagraphs (i) to (viii); or <p>(d) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or</p> <p>(e) represents a danger to the public or the financial system; or</p> <p>(f) is prescribed by the regulations for the purposes of this paragraph (there are none as at 10 May 2019)</p>
Prudential Standards	<p>APRA Prudential Standard 510 Governance</p> <p>APRA Prudential Standard 520 Fit and Proper</p>



Policies and Standards

Corporate Governance Policy
Ethics and Integrity in Practice

Guidelines/ Procedures

Whistleblower Program
Whistleblower Procedure



11. Schedule 1

Everyone is entitled to work in an ethical workplace free of harassment, bullying, corruption and illegal activities.

Great Southern Bank engages the services of Stoptline, an Australian based leading provider of whistleblower programs and related hotline and investigation services. The Stoptline Whistleblower Hotline is provided for any team member, supplier or customer to anonymously report suspected or actual wrongdoing.

Stoptline can be contacted through the following means:

Stoptline

Website: www.greatsouthernbank.stoplinereport.com

Freecall 8.00am to 8.00pm Monday to Friday: 1300 304 550

Email: Great Southern Bank@stopline.com.au

Mail: C/o The Stoptline

Locked Bag 8, Hawthorne VIC, 3122

More information relating to Stoptline can be found at:

www.greatsouthernbank.stoplinereport.com

Details of Auditor

Martin Wardle/ Ben Flaherty

KPMG

GPO Box 223

Brisbane QLD 4001

07 3233 3111

Details of Actuary Note:

Great Southern Bank does not have an actuary. Only the following subsidiaries do: CUA Health and Credicorp

Insurance Jamie Reid (CUA Health Actuary) / Stephen Lee (Credicorp Insurance)

Finity Consulting

Level 7, 68 Harrington Street

The Rocks NSW 2000

02 8252 3300

For the purposes of this policy to ensure appropriate escalation and timely investigation, we request that reports are made to any one of our Whistleblower Protections Officers, listed below:

- Chief People Officer
Whistleblower Policy



Tracey Lake
Phone: 07 3552 4606
Email: tracey.lake@gsb.com.au

- Chief Financial Officer
Alana Bailey
Phone: 07 3552 4390
Email: alana.bailey@gsb.com.au

At times, either whistleblowers or the individuals who are the subject of a disclosure, may require confidential support services. Assure provides CUA's Employee Assistance Program and can be contacted on 1800 808 374 or assureprograms.com.au

Regulators such as ASIC, APRA and ATO may be contacted through the various contact details set out on their respective websites.

Board members may be contacted through the company secretary:

- Company Secretary
Nicole Pedwell
Phone: 07 3552 4313
Email: Nicole.pedwell@gsb.com.au



12. Annexure A – Special Protections under the Corporations Act

The Corporations Act gives special protection to disclosures about any misconduct or improper state of affairs relating to CUA if the following conditions are satisfied:

1. The whistleblower is or has been:
 - (a) an officer or team member of a CUA Group company;
 - (b) an individual who supplies goods or services to a CUA Group company or an team member of a person who supplies goods or services to a CUA Group company;
 - (c) an individual who is an associate of a CUA Group company; or
 - (d) a relative, dependent or dependent of the spouse of any individual referred to in (a) to (c) above.

2. The report is made to:
 - (a) a Whistleblower Protections Officer;
 - (b) an officer or senior manager of a CUA Group company concerned;
 - (c) CUA's external auditor (or a member of that audit team);
 - (d) an actuary of a CUA Group company;
 - (e) ASIC;
 - (f) APRA; or
 - (g) a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act;

or the disclosure is an emergency or public interest disclosure.

1. The whistleblower has reasonable grounds to suspect that the information being disclosed concerns misconduct, or an improper state of affairs or circumstances in relation to the CUA Group. This may include a breach of the relevant legislation applicable to this policy, including the Corporations Act, an offence against the Commonwealth punishable by imprisonment for 12 months or more or conduct that represents a danger to the public or financial system.

2. Examples of conduct which may amount to a breach of the Corporations Act include: insider trading, insolvent trading, breach of the continuous disclosure rules, failure to keep accurate financial records, falsification of accounts, failure of a director or other officer of the Group to act with the care and diligence that a reasonable person would exercise, or to act in good faith in the best interests of the corporation or failure of a director to give notice of any material personal interest in a matter relating to the affairs of the company.

3. The protections given by the Corporations Act when these conditions are met are:
 - (a) the whistleblower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure;
 - (b) no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the whistleblower for making the report;
 - (c) the reported information is not admissible against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty other than proceedings Whistleblower in respect of the falsity of the information (however other than provided for in this subparagraph (c), the protections do not prevent the



discloser being subject to any civil, criminal or administrative liability for conduct of the discloser that is revealed by the discloser);

(d) anyone who causes or threatens to cause detriment to a whistleblower or another person in the belief or suspicion that a report has been made, or may have been made, proposes to or could be made, may be guilty of an offence and may be liable for damages; (e) a whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary; (f) the person receiving the report commits an offence if they disclose the substance of the report or the whistleblower's identity, without the whistleblower's consent, to anyone except ASIC, APRA, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report.

Confidentiality

If a report is made, the identity of the discloser must be kept confidential unless one of the following exceptions applies:

- (a) the discloser consents to the disclosure of their identity;
- (b) disclosure of details that might reveal the discloser's identity is reasonably necessary for the effective investigation of the matter;
- (c) the concern is reported to ASIC, APRA, or the AFP; or
- (d) the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.



13. Annexure B – Special Protections under the Taxation Administration Act

The Taxation Administration Act gives special protection to disclosures about a breach of any Australian tax law by CUA or misconduct in relation to Great Southern Bank Group's tax affairs if the following conditions are satisfied:

1. The whistleblower is or has been:
 - (a) an officer or team member of a CUA Group Company;
 - (b) an individual who supplies goods or services to a CUA Group Company or an team member of a person who supplies goods or services to a CUA Group company;
 - (c) an individual who is an associate of a CUA Group company;
 - (d) a spouse, child, dependent or dependent of the spouse of any individual referred to in (a) to (c) above.

2. The report is made to:
 - (a) a Whistleblower Protections Officer;
 - (b) a director, secretary or senior manager of a CUA Group Company concerned;
 - (c) any CUA Group Company external auditor (or a member of that audit team) ;
 - (d) a registered tax agent or BAS agent who provides tax or BAS services to a CUA Group company;
 - (e) any other team member or officer of CUA who has functions or duties relating to tax affairs of the company (e.g. an internal accountant);
 - (f) the Commissioner of Taxation; or
 - (g) a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Taxation Administration Act.

3. If the report is made to a CUA recipient, the whistleblower:
 - (a) has reasonable grounds to suspect that the information indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of a CUA Group Company or an associate of that company; and
 - (b) considers that the information may assist the CUA recipient to perform functions or duties in relation to the tax affairs of a CUA Group Company or an associate of the company.

4. If the report is made to the Commissioner of Taxation, the whistleblower considers that the information may assist the CUA recipient to perform functions or duties in relation to the tax affairs of a CUA Group Company or an associate of the company.

5. The protections given by the Taxation Administration Act when these conditions are met are:
 - (a) The whistleblower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure;
 - (b) no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the whistleblower for making the report;
 - (c) where the disclosure was made to the Commissioner of Taxation, the reported information is not admissible against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, except where the proceedings are concerned with whether the information is false;



- (d) unless the whistleblower has acted unreasonably, a whistleblower cannot be ordered to pay costs in any legal proceedings in relation to a report;
- (e) anyone who causes or threatens to cause detriment to a whistleblower or another person in the belief or suspicion that a report has been made, or may have been made, proposes to or could be made, may be guilty of an offence and liable to pay damages;
- (f) a whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary; and
- (g) the person receiving the report commits an offence if they disclose the substance of the report or the whistleblower's identity, without the whistleblower's consent, to anyone except the Commissioner of Taxation, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report.

Confidentiality

If a report is made, the identity of the discloser will be kept confidential unless one of the following exceptions applies:

- (a) the discloser consents;
- (b) disclosure of details that might reveal their identity is reasonably necessary for the effective investigation of the allegations;
- (c) the concern is reported to the Commissioner of Taxation or the AFP; or
- (d) the concern is raised with a lawyer for the purpose obtaining legal advice or representation.

