



# 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. 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 free to speak up if they see something happening at IAG that isn't right,
  - b) People can report wrongdoing safely, knowing they will be protected and that their report will be handled fairly and efficiently, and
  - c) IAG meets its legislative and regulatory requirements.

## Who this applies to and when

3. This Policy applies to Eligible Whistleblowers, who are defined in section 16 below.
4. It applies whenever:
  - a) You see or suspect something happening at IAG that you think is Reportable Conduct, or
  - b) Someone discloses Reportable Conduct under this Policy.

**TIP:** "Reportable Conduct" is defined in the Definitions section 16 below. It might include theft, fraud, money laundering, financial irregularities, bribery, corruption, conflicts of interest, criminal damage to property, violence, bullying, discrimination or harassment, workplace health and safety risks, leaking confidential information or harming someone who makes a report under this Policy. It does not always involve breaking the law.

Reportable Conduct does NOT include personal work-related grievances such as interpersonal conflicts or decisions about promotion, remuneration or termination. However, if your work-related grievance also includes Reportable Conduct, it will still be handled in accordance with this Policy.

If you make a report under this Policy that does NOT involve Reportable Conduct, your report will not be eligible for protection under the Corporations Act 2001 (Cth) or the Tax Administration Act 1953 (Cth).

If you make a report that does involve Reportable Conduct but it turns out to be wrong, your report will still be protected under this Policy.

# Requirements

## Reporting Conduct

5. If you see or suspect something is happening at IAG that you think is Reportable Conduct, report it to someone who is an Eligible Recipient (defined in Section 16 below) or to the Whistleblower Line. You can make a report by telephone, email, letter, the website or in a meeting during or outside of business hours. The contact details for the Whistleblower Line are in the table below:

WHISTLEBLOWER LINE CONTACT DETAILS	
<b>Website:</b>	<a href="http://www.iagactionline.deloitte.com.au">www.iagactionline.deloitte.com.au</a> (User ID: iag, Password: insurance)
<b>Email:</b>	<a href="mailto:IAGActionLine@deloitte.com.au">IAGActionLine@deloitte.com.au</a>
<b>Telephone:</b>	Australia and Asia: +61 1800 110 287      New Zealand: 0800 407 627
<b>Mail:</b>	IAG ActionLine Reply Paid 12628 A'Beckett Street VICTORIA 8006 AUSTRALIA

6. As well as an Eligible Recipient, you can also report something to:
- An Australian government authority, such as the Australian Securities & Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA), Australian Taxation Office (ATO) or Australian Federal Police (AFP), or
  - A lawyer if you want legal advice or representation about any of the whistleblower provisions. You will be protected even if the information you report is found by the lawyer not to include Reportable Conduct.
7. In some circumstances, you can also make a “public interest disclosure” or “emergency disclosure” to a journalist or parliamentarian. Refer to Appendix A for more information.
8. You can report something anonymously if you prefer, but the investigation may be more effective if you share your identity because the investigator might need more information. If you do share your identity, it will be shared with the people involved in the investigation and with the Whistleblower Protection Officer, who will do what is reasonable to keep your identity confidential.
9. If you share your identity and you give permission to be contacted, the Whistleblower Protection Officer will support you during the investigation and tell you about the progress of the investigation. They may also contact you if more information is needed to finish the investigation.

## Protection and Support

10. If you are an Eligible Whistleblower and you report something that is Reportable Conduct to anyone listed in sections 5 or 6, you will be protected and supported in these ways:
- You can remain anonymous and, if you prefer, you do not have to answer questions.
  - IAG must keep your identity confidential. It is illegal to identify you except as set out in this section 10.
  - IAG can share information about your report if it is needed to investigate the matter but must protect your identity and do what is reasonable to stop you being identified, including:
    - Not sharing information that could reveal your identity unless you agree. IAG can share this information with ASIC, APRA, ATO or AFP or with a lawyer to get legal advice or representation,
    - Referring to you in a gender-neutral way,
    - Making sure your report is managed by people who are trained and qualified.
  - IAG will not retaliate and will not tolerate any retaliation against you for making your report (such as through harassment, bullying, discrimination or dismissal).
  - You will not have any legal liability just because you made a report but making a report will not protect you from the consequences of your own Reportable Conduct.
  - Just making a report will not breach any contract to which you may be a party.

- g) If you have suffered loss or damage after making your report because IAG did not do what is reasonable to stop your loss or damage, you can sue IAG.
- h) You can seek advice from the Whistleblower Protection Officer.
- i) You can make a complaint to the Whistleblower Protection Officer or to a regulator such as ASIC, APRA or the ATO, including about an investigation, confidentiality or your protection under this Policy.
- j) If you are an IAG employee or contractor or immediate family member, you can get confidential support and counselling by calling IAG's CARE Program on +61 1800 808 374.

## Investigations

11. If you receive or investigate a report made under this Policy:

- a) If you have a conflict of interest about the matter, tell the Whistleblower Protection Officer.
- b) Make a plan for the investigation based on the type and complexity of what was reported, and if the person who made the report needs to stay anonymous.
- c) Investigate in a way that is confidential, fair and objective.
- d) If the person who made the report wants to stay anonymous, do not share information that could identify them.
- e) If you know who made the report and have their contact details:
  - i. Endeavour to tell them about the progress of the investigation within 20 days and each month until the investigation is finished, and
  - ii. Contact them if you need more information to do the investigation properly, or to work out what information could accidentally identify them if it was shared.
- f) If you do not know who made the report or cannot contact them, do the investigation as well as you can.
- g) You can talk with IAG people who have expertise in the things you are investigating and get technical or legal advice if you need it, but make sure the identities of the person who made the report and other people involved are kept confidential.
- h) Keep confidential the identities of the person who made the report and other people involved in the things you are investigating.
- i) Treat people fairly and, where appropriate, give them an opportunity to tell you what happened, including people who are mentioned in the report.
- j) If you collect documents, keep them confidential in a safe place where people who are not working on the investigation cannot access them.
- k) Report your findings to the EGM Group Internal Audit and / or to the Whistleblower Protection Officer. The EGM Internal Audit will:
  - i. Report the findings to IAG's Board Risk Committee, and
  - ii. Tell the person who made the report that the investigation is finished and may, if appropriate, tell them the outcome.

## Accountabilities

12. The accountabilities in relation to this Policy are set out in the table below:

<b>Position</b>	<b>Accountabilities</b>
<b>Eligible Recipient</b>	Receiving reports made and following this Policy.
<b>Whistleblower Protection Officer</b>	Protecting Eligible Whistleblowers from loss or damage because they made a report under this Policy. Making sure the protection and support in section 10 are provided to Eligible Whistleblowers who report Reportable Conduct. Answering questions about this Policy. Providing advice and support if someone makes a complaint or reports a concern, including about an investigation, confidentiality or protection under this Policy.
<b>Whistleblower Investigation Officer</b>	Investigating reports, following section 11 and the Group Whistleblower Procedure. Getting technical or legal advice as needed, including talking with IAG people who have expertise in the things being investigated.
<b>EGM Internal Audit (Policy Owner)</b>	Reviewing this Policy at least every three years. Making sure the right people are appointed to conduct investigations under this Policy and to the position of Whistleblower Protection Officer. Reviewing those appointments at least each year. Co-ordinating and supporting investigations under this Policy. Reviewing the provider of the Whistleblower Line at least once each year and making reasonably sure they are providing it and in a way that meets this Policy and IAG's needs. Monitoring compliance with this Policy. Making sure this Policy is available on IAG's intranet and external website. Making sure people are trained about this Policy and their accountabilities under it.

## Breaches

13. 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.
14. If you break the law you might face criminal or civil liability.
15. If you become aware of a breach of this Policy, tell the EGM Internal Audit, who will make sure it is investigated.

## Definitions

16. In this Policy:

**“Eligible Recipient”** means someone you can make a report to whilst qualifying for protection under this Policy and includes:

- IAG’s Group Chief Executive Officer or a member of the Group Leadership Team,
- A director or the company secretary of IAG,
- An internal or external auditor (KPMG) doing an audit, or an actuary of IAG, or
- The Whistleblower Line (see section 5 above for details).
- An Australian government authority (such as the Australian Securities & Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA), Australian Taxation Office (ATO) or Australian Federal Police (AFP)).

For an IAG superannuation entity, “Eligible Recipient” also means a person who is:

- A trustee or an officer of a company that is a trustee.

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

- An employee of IAG,
- A director or the company secretary of IAG,
- A supplier, or an employee of a supplier, of goods or services to IAG, or
- A relative, dependant or spouse of any of the above people.

For an IAG superannuation entity, “Eligible Whistleblower” also means a person who is:

- A trustee, custodian or investment manager,
- An officer or employee of a company that is a trustee, custodian or investment manager,
- A supplier of goods or services to the trustee, custodian or investment manager,
- An officer or employee of a company that is a supplier, or
- A relative, dependent or spouse of any of the above people.

**“Reportable Conduct”** means:

- Misconduct or an improper state of affairs in relation to IAG, or
- Conduct that constitutes an offence under or contravention of the:
  - Corporations Act 2001 (Cth),
  - Australian Securities and Investments Commission Act 2001 (Cth),
  - Insurance Act 1973 (Cth),
  - National Consumer Credit Protection Act 2009 (Cth),
  - Superannuation Industry (Supervision) Act 1993 (Cth),
  - Taxation Administration Act 1953 (Cth),
  - Banking Act 1959 (Cth),
  - Financial Sector (Collection of Data) Act 2001 (Cth), or
  - Life Insurance Act 1995 (Cth), or
- Conduct that constitutes an offence under any other law of the Commonwealth that is punishable by imprisonment for more than 12 months, or
- A danger to the public or the financial system.

## Contacts for questions and more information

17. This Policy is owned by the EGM Internal Audit. If you have any questions or want more information about this Policy, please contact:

- The Whistleblower Protection Officer,
- Group Internal Audit, or
- Group People, Performance and Reputation.

## Policy information

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<b>Effective from</b>	21 April 2020
<b>Owner</b>	EGM Internal Audit
<b>Approver</b>	IAG Board
<b>Next Review due</b>	21 April 2023
<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 Whistleblower Procedure</li><li>• Group Risk Management Strategy (RMS)</li><li>• IAG Code of Ethics and Conduct</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></ul>

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## Document history

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<b>Version</b>	<b>Date</b>	<b>Amended by</b>	<b>Details of amendment</b>
1	21 April 2020	Policy Review Committee	Updated for new group policy template.

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# Appendix A

## Public Interest Disclosures and Emergency Disclosures

In some circumstances, you can disclose information to a journalist or member of the Commonwealth, state or territory parliaments by making a “public interest disclosure” or “emergency disclosure”. These circumstances are limited and tightly controlled by the legislation, so IAG strongly recommends that you obtain legal advice before making a “public interest disclosure” or “emergency disclosure”.

In summary, you can make:

- a) A “public interest disclosure” to a journalist or parliamentarian if:
  - i. You have previously disclosed Reportable Conduct involving IAG to an Australian government authority (such as ASIC, APRA, the ATO or AFP),
  - ii. At least 90 days have passed since you reported the matter and you do not have reasonable grounds to believe that action is being taken,
  - iii. You have reasonable grounds to believe that it is in the public interest to make a further disclosure,
  - iv. You have notified the Australian government authority in writing that you intend to report the matter to a journalist or parliamentarian, and
  - v. You don't disclose any more information than is needed to inform the journalist or parliamentarian of the previous disclosure of the misconduct or improper state of affairs.
- b) An “emergency disclosure” to a journalist or parliamentarian if:
  - i. You have previously disclosed Reportable Conduct involving IAG to an Australian government authority (such as ASIC, APRA, the ATO or AFP),
  - ii. You have reasonable grounds to believe that the information concerns a substantial and imminent danger to someone's health or safety or to the environment,
  - iii. You have notified the Australian government authority in writing that you intend to report the matter to a journalist or parliamentarian, and
  - iv. You don't disclose any more information than is needed to inform the journalist or parliamentarian of the substantial and imminent danger.

If you do this, your disclosure will be protected as set out in section 10 of this Policy.