



Creating financial independence since 1846

IOOF Whistleblower Policy

29 November 2019

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1 Overview

1.1 Policy Statement

The IOOF Group (**IOOF**) is committed to promoting and reinforcing a culture of honest and ethical behaviour, corporate compliance and strong corporate governance in its business activities.

IOOF encourages Employees (and other Eligible Whistleblowers) to raise concerns in relation to suspected Improper Conduct (see **section 3.2**) and is committed to supporting and protecting Whistleblowers who raise such concerns.

1.2 Introduction

It is important for all IOOF Employees to be aware that there is a statutory regime¹ in Australia for the protection of Whistleblowers. The regime recognises the critical role whistleblowing can play in the early detection and prosecution of misconduct.

Under the Whistleblower regime, Eligible Whistleblowers who make Protected Disclosures to Eligible Recipients are legally protected from reprisals.

The IOOF Whistleblower Policy (**Policy**) sets out:

- who is an Eligible Whistleblower (**section 2**)
- what is a Protected Disclosure and what is Improper Conduct (**section 3**)
- how to make a Protected Disclosure (**section 4**)
- who is an Eligible Recipient (**section 5**)
- how to make a report to the External Whistleblower Officer (**section 6**)
- how a Whistleblower report will be investigated (**section 7** and **section 8**)
- the protections available to Whistleblowers (**section 9**)
- anonymity and confidentiality considerations (**section 10**)
- delegating responsibilities under the Policy (**section 11**) and
- how the Policy is made available to all IOOF staff (**section 12**).

1.3 Scope

This Policy applies to all instances of Improper Conduct (see **section 3.2**) in relation to all entities within the IOOF Group.

¹ *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)*, *Corporations Act 2001 (Cth)* and *Taxation Administration Act 1953 (Cth)*.

2 Who is an Eligible Whistleblower?

An employee (or other person) who reports Improper Conduct (see **section 3.2**) that has occurred within an IOOF Group entity is a Whistleblower.

Eligible Whistleblowers include a current or former:

- employee, director, officer, consultant, supplier (or employee of a supplier) or associate of an IOOF Group entity
- contractor, or an employee of a contractor, who has supplied goods or services to an IOOF Group entity. This can be either paid or unpaid, and can include volunteers
- trustee, custodian or investment manager, or their officers, employees and suppliers (and their employees) of an IOOF Superannuation entity, or
- spouse, relative or dependant of any of the above persons.

If you fall into one of the following categories, you may **not** be covered by the whistleblower protections:

- people experiencing employment disputes or a Personal Work-Related Grievance (see **section 3.3**)
- competitors
- customers or clients.

3 What is a Protected Disclosure?

3.1 Protected Disclosures of Improper Conduct

Under the Whistleblower regime, an Eligible Whistleblower who makes a Protected Disclosure about Improper Conduct (see **section 3.2**) that occurs within an IOOF Group entity will be protected from reprisals.

To be a Protected Disclosure, the disclosure must:

- be made by an Eligible Whistleblower
- be made to an Eligible Recipient, and
- contain information which a Whistleblower suspects on Reasonable Grounds is or concerns Improper Conduct.

Reasonable Grounds means that a reasonable person in your position would also suspect the information indicates Improper Conduct.

3.2 Improper Conduct

Improper Conduct is conduct that is illegal, dishonest, unacceptable or undesirable, or the concealment of such conduct.

Examples of Improper Conduct includes conduct that:

- is against the law or is a failure by an IOOF Group entity to comply with a legal obligation
- is dishonest, fraudulent, negligent or corrupt (e.g., theft, drug sales/use, violence or threatened violence and criminal damage against property)
- is potentially damaging to an IOOF Group entity, an Employee or a third party, including unsafe work practices, environmental damage, health risks or substantial wasting of corporate resources
- is misleading or deceptive conduct of any kind, including questionable accounting or financial reporting practices
- involves bullying, harassment, victimisation or discrimination
- is unethical, a breach of trust and/or duty, or a breach of IOOF's policies, protocols or Codes of Conduct (e.g., dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching the Code of Conduct)
- constitutes a failure to identify, report, record, manage or treat a conflict of interest or a failure to follow-up or rectify an event of non-compliance, including a breach of the IOOF Group Conflicts of Interest Management Policy or other relevant IOOF policy
- constitutes an offence against, or a contravention of any law administered by the Australian Prudential Regulation Authority (**APRA**) or the Australian Securities and Investments Commission (**ASIC**)
- constitutes a Commonwealth offence punishable by imprisonment of 12 months or more
- poses a danger to the public or the financial system
- is likely to cause financial or non-financial loss to an IOOF Group entity, or be otherwise detrimental to the interests of an IOOF Group entity
- is misleading with respect to the tax affairs of an IOOF Group entity, including tax avoidance behaviour.

3.3 Personal Work-Related Grievances are Not Protected Disclosures

Disclosures related to Personal Work-Related Grievances are not covered by the Whistleblower regime – instead they remain under the jurisdiction of the *Fair Work Act 2009* (Cth).

Examples of a Personal Work-Related Grievance include:

- an interpersonal conflict with another employee
- a decision about your employment, transfer or promotion

- a decision about the terms of your employment
- a decision to suspend or terminate your employment or otherwise discipline you.

Personal Work-Related Grievances can be raised with an Employee's Manager, their Human Resources Business Partner or the Chief People Officer.

However, if you believe an IOOF Group company's treatment of you breaks employment or other laws, or suggests systemic misconduct beyond your own circumstances, you may be covered by the Whistleblower protections. You are encouraged to seek legal advice about whether you may be covered by the Whistleblower protections.

3.4 General Disclosures

Where the requirements for a Protected Disclosure are not met, a report can still be made under this Policy of any known or suspected wrongful act (a **General Disclosure**). IOOF will not tolerate any form of harassment or retaliation against an Employee who makes a General Disclosure in accordance with this Policy, provided their report is made:

- in circumstances where the Employee reasonably believes it to be true, and
- without malice.

Threats to cause detriment to the Employee (whether express, implied, conditional or unconditional) are also prohibited, whether or not the person threatened actually fears that the threat will be carried out.

4 How to Make a Protected Disclosure

4.1 How to Make a Report

A report may be made in person, by telephone or in writing (including by email) by following the procedures set out in **section 4.2** below. It is strongly recommended that an Eligible Whistleblower make their report in writing. Disclosures may be made anonymously and/or confidentially, securely and outside of business hours.

A Whistleblower report should be made:

- to an Eligible Recipient (see **section 5**), or
- directly to the External Whistleblower Officer (see **section 6**).

A summary of reporting options is attached as **Schedule 2** to this Policy.

4.2 What Should a Whistleblower Report Contain?

A Whistleblower's report should contain as much of the following information as possible:

- the person(s) suspected of (or involved in) any Improper Conduct
- the nature of the suspected Improper Conduct
- the dates of the suspected Improper Conduct
- any evidence (in any format) and the location of such evidence
- details of any witnesses, and
- the Whistleblower's identity and contact details (although disclosures may be made anonymously, it is recommended that a Whistleblower provide their identity because they may need to be spoken to again if clarification or further information is needed).

A template Whistleblower Report Form is attached as **Schedule 1** to this Policy.

4.3 Important Considerations Before Reporting

It is important that a Whistleblower who reports information under this Policy has Reasonable Grounds for suspecting that the information concerns Improper Conduct in relation to an IOOF Group company.

If a Whistleblower deliberately or maliciously makes a false report without reasonable grounds, IOOF reserves the right to take appropriate disciplinary action against that Whistleblower.

5 Eligible Recipients

5.1 Who is an Eligible Recipient?

To be a Protected Disclosure, an Eligible Whistleblower report about Improper Conduct (see **section 3.2**) must be made to an Eligible Recipient.

An Eligible Recipient is a person to whom an Eligible Whistleblower may disclose their concerns and includes:

- an officer, director or senior manager of an IOOF Group entity
- an auditor, or member of an audit team conducting an audit, of an IOOF Group entity
- an actuary of an IOOF Group entity
- ASIC or APRA (or another prescribed Commonwealth authority)
- a Whistleblower Protection Officer (**WPO**) who is authorised by IOOF to receive disclosure (see **section 5.2**)
- your lawyer.

Superannuation Entities

Where the relevant Improper Conduct (see **section 3.2**) involves an IOOF Superannuation Entity, an Eligible Recipient also includes:

- an individual who is a trustee (or a director of the trustee) of the IOOF Superannuation Entity, or
- a person authorised by the trustee of the IOOF Superannuation Entity to receive disclosure.

An IOOF Superannuation Entity includes the IOOF Group companies that are a registered superannuation fund, an approved deposit fund or a pooled superannuation trust and currently includes the SMF Eligible Rollover Fund, the IOOF Portfolio Service Superannuation Fund, the AvWrap Retirement Service Fund and various AET small APRA Funds.

Tax-related misconduct

Where the relevant Improper Conduct is tax-related misconduct, an Eligible Recipient also includes:

- an Employee of an IOOF Group entity who has functions or duties that relate to the tax affairs of an IOOF Group entity (e.g., a senior member of the IOOF Corporate Finance Team)
- a registered tax agent or BAS agent who provides services to an IOOF Group entity
- for any IOOF Group entity that is a trust, the trustee of the IOOF Group entity or a person authorised by the trustee to receive disclosures, or
- the Australian Taxation Office (**ATO**).

5.2 Whistleblower Protection Officer (WPO)

IOOF has appointed a Whistleblower Protection Officer (**WPO**) to receive Whistleblower reports and to safeguard the interests of Whistleblowers, so they feel free to report without fear of retaliatory action.

Whistleblowers can seek advice from the WPO prior to, or after, making a report.

The WPO will provide reports of any Whistleblower notifications to the Chair of the Group Risk & Compliance Committee and any other relevant Risk & Compliance Committee.

The WPO is the IOOF Chief People Officer, or a delegate (see **section 11**).

5.3 Eligible Recipients of Public Interest or Emergency Disclosures

An Eligible Whistleblower can make a public interest or emergency disclosure to a journalist or a parliamentarian in certain limited circumstances, as set out below:

Public Interest and Emergency Disclosure Requirements	
<ul style="list-style-type: none"> the information was previously disclosed to ASIC or APRA the previous disclosure was a Protected Disclosure written notification was given to ASIC/APRA that the Whistleblower intends to make a public interest disclosure the public interest disclosure is restricted to no more information than reasonably necessary 	
Public interest disclosures Additional requirements	Emergency disclosures Additional requirements
<ul style="list-style-type: none"> 90 days have passed since the previous disclosure was made to ASIC/APRA there are reasonable grounds to believe the disclosure is in the public interest there are no reasonable grounds to believe that action is being taken or has been taken to address the disclosed matter you give ASIC/APRA a written notice that includes sufficient information to identify your earlier report (such as contacting the officer who considered your concerns and quoting the reference number of your case), and states your intention to make a public interest disclosure 	<ul style="list-style-type: none"> no waiting period since previous disclosure to ASIC/APRA there are reasonable grounds to believe the information concerns a substantial and imminent danger to health or safety to persons or the environment

6 Reports to the External Whistleblower Officer

6.1 External Whistleblower Officer

If an Eligible Whistleblower is not comfortable using the internal IOOF Group procedures for reporting problems, or has already and is not satisfied the matter has been adequately dealt with, they may report the matter to the External Whistleblower Officer.

PricewaterhouseCoopers (**PwC**) is IOOF's External Whistleblower Officer (**EWO**), responsible for handling external Whistleblower reports made to it.

The EWO is independent from the IOOF group.

The EWO will provide reports of any Whistleblower notifications to the Chair of IOOF's Group Risk & Compliance Committee and any other relevant IOOF Risk & Compliance Committee.

6.2 The Whistleblower Hotline

The Whistleblower Hotline is a confidential hotline managed by the EWO, to which Whistleblowers can report (anonymously if they wish) cases of suspected Improper Conduct.

6.3 How to Contact the External Whistleblower Officer

A Whistleblower can make an external disclosure by using the contact details below:

Whistleblower Hotline	1800 792 793
EWO Email	IOOFWhistleblower@au.pwc.com
EWO Address	IOOF External Whistleblower Officer PO Box Q654, QVB Post Office Sydney NSW 1230

When making an external disclosure, the Whistleblower will be encouraged to provide as much information as possible regarding the matter they wish to report (refer to **section 4.3** for the types of information to include).

6.4 Investigations by the External Whistleblower Officer

The EWO is responsible for conducting a preliminary investigation into any Whistleblower report it receives to determine whether the reported matter is made on reasonable grounds and sufficient for further investigation.

All matters determined by the EWO to **not** warrant further external investigation will be referred, as appropriate, to the WPO (**section 5.2**).

All matters determined by the EWO to warrant further investigation will be referred to the WIO (**section 7.1**).

The WIO will review all referred Whistleblower disclosures and assess the EWO's preliminary findings to confirm whether a further investigation into the reported matters is required.

In circumstances where the WIO determines a matter does **not** require further investigation, the WIO will refer the matter to the WPO who will discuss the matter with the Whistleblower.

In circumstances where the WIO determines an investigation is necessary, the WIO will liaise with the EWO and the Whistleblower Investigations Team (see **section 7.2**).

7 Investigating a Whistleblower report

7.1 Whistleblower Investigations Officer

The Whistleblower Investigations Officer (**WIO**) is a person appointed by IOOF to review and investigate reports made under this Policy. The WIO has a direct reporting line to the Chief Executive Officer.

A report detailing the matter, reasons for the assessment and rectification actions implemented will be prepared by the WIO.

The WPO and the WIO act independently of each other and the responsibilities of these roles do not reside with one person.

The WIO is the IOOF Chief Risk Officer, or a delegate (see **section 11**).

7.2 Assessment by the Investigations Team

Reports made under this policy will be investigated by the Whistleblower Investigations Team. The WIO will ensure that all members of the investigations team are, as far as practicable, independent of both the Whistleblower and any person who may be the subject of the allegations.

The Whistleblower Investigations Team consists of:

- the WIO
- members of the IOOF Financial Crime Working Group
- other internal/external persons, as required.

Within 10 working days of the report being made, the Whistleblower will be:

- informed of who is on the investigations team and how to contact them
- advised whether anything further is needed from them
- provided, if requested, a summary of the matter and an outline of how IOOF proposes to address it.

During the course of the investigation, the WIO will regularly communicate with the Whistleblower.

Investigations Report

The Whistleblower Investigations Team will be given a reasonable timeframe within which to report to the Company Secretary and Group General Counsel with the results of their investigation and recommendations. The investigations report will take into account key witness statements and evidence and will recommend a course of action, including any appropriate remediation steps.

7.3 Finalising the Whistleblower Process

The Company Secretary and Group General Counsel will review the investigations report and consider any findings and/or recommendations before making a determination in their final report.

Any determination made finalises the internal Whistleblower process. However, the Whistleblower may still have recourse by using external processes (depending on the circumstances).

The final report will be provided to the:

- Chair of the Audit Committee
- Chair of the Group Risk & Compliance Committee (and any other relevant Risk & Compliance Committee)
- CEO.

The CEO will provide the final report to the relevant Board(s) (and to senior managers, as appropriate).

To the extent actions are to be undertaken, the WIO and the WPO must be kept informed of progress.

Any documents pertaining to a Whistleblower report, including subsequent investigations, findings, recommendations and meeting minutes will be kept in secure storage by the WIO. Reports will be provided to internal and external auditors as appropriate.

7.4 Consequences of an investigation

The consequences for an Employee found to have engaged in Improper Conduct will depend on the circumstances. Such consequences may include appropriate disciplinary measures including, in serious cases, termination.

Any suspected criminal acts will be reported to the Australian Federal Police (AFP) by the WIO.

If suspected Improper Conduct relates to a regulatory breach, it will be handled in accordance with the IOOF's Breach and Incident policies and procedures.

8 Whistleblower Reports about Specific Roles

8.1 Reporting about the CEO, the CEO's direct reports, the WPO or Employees in Legal, Compliance or Risk

Where the suspected Improper Conduct (see **section 3.2**) involves the CEO or the CEO's direct reports, the WPO, or Employees that form part of the Legal, Compliance or Risk teams, the investigation process will be undertaken as outlined in the table below:

Procedure	Whistleblower report relates to the CEO or CEO's direct reports	Whistleblower report relates to the WPO or a member of the Legal, Compliance or Risk teams
Who should receive the Whistleblower report?	The Chair of the IOOF Holdings Ltd Board	The CEO
Who assesses the Whistleblower report?	The EWO or An appropriate external party, as determined by the Chair of the IOOF Holdings Ltd Board	The EWO or An appropriate external party, as determined by the CEO
Who investigates the Whistleblower report?	The EWO or An appropriate external party, as determined by the Chair of the IOOF Holdings Ltd Board	The EWO or An appropriate external party, as determined by the CEO
How will the Whistleblower process be finalised?	The non-executive directors of the IOOF Holdings Ltd Board will review any findings and recommendations before determining the appropriate course of action to be taken	The IOOF Holdings Ltd Board will review any findings and recommendations before determining the appropriate course of action to be taken
Who should receive the reports?	Reports are to be provided to the non-executive directors of the IOOF Holdings Ltd Board	Reports are to be provided to the Chair of the IOOF Holdings Ltd Board

9 How are Whistleblowers protected?

9.1 Support to Whistleblowers

IOOF is committed to providing support to Whistleblowers who make Protected Disclosures, including:

- monitoring the behaviour of other Employees relating to a reported matter
- providing a paid leave of absence while a matter is investigated, or
- relocating Employees to different working groups or departments.

9.2 Legislative protections

A Whistleblower who makes a Protected Disclosure is afforded legislative protections including:

- making it an offence to disclose information which would identify the Whistleblower or would be likely to lead to their identification without their consent (except as outlined in **section 10.2**)
- protection from being subject to any criminal (unless the disclosure is false), civil, or administrative liability (including disciplinary action) for making the disclosure
- protection from enforcement or exercise of any contractual or other remedy or right on the basis of the disclosure
- prevention of the information disclosed from being used as evidence against the Whistleblower in criminal proceedings, or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information
- giving the Whistleblower qualified privilege in respect of the information disclosed
- prevention of the termination of a contract to which the Whistleblower is a party, on the basis that the disclosure is a breach of that contract
- making it an offence for a person to engage in conduct that causes any detriment to the Whistleblower or another person, if that person does so because he or she believes or suspects that the Whistleblower or any other person made, may have made, proposes to make or could make a disclosure that qualifies for protection, and
- making it an offence for a person to threaten to cause detriment to the Whistleblower or another person and that person intends the Whistleblower to fear that the threat will be carried out.

A person may be causing you detriment if they:

- dismiss you from your employment
- alter your position or duties to your disadvantage
- discriminate between you and other employees

- harass or intimidate you
- harm or injure you, including causing you psychological harm
- damage your property
- damage your reputation
- damage your financial position
- cause you any other damage.

A Whistleblower may seek compensation and other remedies through the courts if:

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

In such circumstances, IOOF encourages you to seek independent legal advice.

9.3 Fair Treatment for Employees Referred to in Whistleblower Reports

IOOF is committed to ensuring the fair treatment of any person who is mentioned in a Whistleblower report made under this Policy, or to whom such report relates, by investigating all Whistleblower reports in a fair and transparent manner in accordance with this Policy.

Any Employee who is the subject of an allegation and is under investigation will be given a fair opportunity to respond to the allegation.

10 Confidentiality

10.1 Anonymity

A Whistleblower who elects to make a report anonymously will still be protected.

10.2 Identity of a Whistleblower

The identity of a Whistleblower will be protected in accordance with applicable legal requirements and, except as authorised, IOOF will not reveal the identity of the Whistleblower, or information likely to lead to the Whistleblower's identification without their consent.

Where considered necessary, the Whistleblower may be contacted to request their consent to reveal their identity to other persons, including IOOF's external legal advisers, the WIO, the CEO, members of the Risk and Compliance Committee and the boards of the relevant IOOF Group entity.

Steps taken to protect a Whistleblower's identity include:

- all personal information referencing the Whistleblower (including their gender) will be redacted from any documentation
- the Whistleblower will be consulted if there are aspects of their disclosure that could inadvertently identify them
- disclosures will be handled and investigated by a restricted number of qualified persons, and access to information relating to a disclosure will be limited to them
- all documents and other materials relating to disclosures will be handled and stored securely.

IOOF may reveal the identity of the Whistleblower where the disclosure is made to:

- (i) the Australian Federal Police (AFP)
- (ii) a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of Whistleblower legislation
- (iii) the Commissioner of Taxation, if the disclosure concerns tax affairs
- (iv) ASIC or APRA, if the report does not concern tax affairs
- (v) a Commonwealth, State or Territory authority if the disclosure is made by ASIC, APRA, or the AFP for the purpose of assisting the authority in the performance of its functions or duties.

10.3 Co-operation and Confidentiality of Investigations

Employees are required to co-operate with any investigations (internal or external) and must treat the investigations as absolutely confidential. Any Employee revealing any details about an investigation may be subjected to disciplinary action which may, in serious cases, include termination.

11 Delegations

All investigations must be conducted by individuals with the appropriate skills and training to conduct the investigation. Investigators must be independent and unbiased in the matter and must ensure that they do not have any actual or perceived conflict of interest.

Where an investigator has an actual or perceived conflict of interest in an investigation (including where they, or a member of their team, is implicated in a report), or where an investigator is otherwise unable to act, that investigator's responsibilities under this Policy will be assigned to an appropriate delegate.

A person assigned any of the roles identified in this Policy in an acting capacity is deemed to have the same delegation as the role itself.

Any delegation must be recorded in writing.

12 Availability of this Policy

This Policy is made available to all IOOF staff through the intranet and will be given to all IOOF staff when they join IOOF.

As part of the 'IOOF Fraud Awareness Program,' Employees will receive relevant training aimed at ensuring they understand how to identify and report suspected Improper Conduct.

13 Review of the Policy

13.1 File details

This Policy will be reviewed annually so it remains consistent with relevant legislative requirements and well as the changing nature of IOOF.

Material amendments to this Policy must be approved by the Board.

Non-material amendments to this Policy may be approved by the Chief Executive Officer.

Owned By: Company Secretary/Group General Counsel

Authorised By: Chief Executive Officer

Last Updated: 29 November 2019

13.2 Revision history

Version	Revision date	Revision notes
9.0	July 2017	Updated to reflect new structure
10.0	August 2018	Revised and updated following an Annual Review
11.0	September 2019	Revised for simplification and to comply with legislative changes
12.0	November 2019	Revised to comply with ASIC RG 270

13.3 Approval


Approval date	Approved by	Notes
Oct 2009	IOOF Holdings Ltd	Approved for IOOF group
Mar 2011	IOOF Holdings Ltd	Approved for IOOF group
Jan 2012	IOOF Holdings Ltd	Approved for IOOF group
Jan 2013	IOOF Holdings Ltd	Approved for IOOF group


Aug 2014	IOOF Holdings Ltd	Approved for IOOF group
July 2015	IOOF Holdings Ltd	Approved for IOOF group
Aug 2016	IOOF Holdings Ltd	Approved for IOOF group
Aug 2017	IOOF Holdings Ltd	Approved for IOOF group
Aug 2018	Managing Director	Approved by Managing Director under delegation
Sept 2019	IOOF Holdings Ltd IIML RSE IOOF Ltd	Approved for IOOF Group Approved for IIML RSE Approved for IOOF Ltd
Nov 2019	IOOF Holdings Ltd IIML RSE IOOF Ltd	Approved for IOOF Group Approved for IIML RSE Approved for IOOF Ltd

Schedule 1 Whistleblower Report

Please refer to the IOOF Whistleblower Policy before completing a Whistleblower Report.

All Whistleblower Reports will be treated with strict confidence.

Whistleblower Form		Date:	
		Received by:	
<input type="checkbox"/>	I consent to the use of the information provided in this report in accordance with IOOF policies and all relevant laws and regulations.	<input type="checkbox"/>	I would like a summary of my concerns and proposed action to be provided to me.
<input type="checkbox"/>	I wish to remain anonymous. <i>(If ticked, the Whistleblower does not have to complete the last section of this Form).</i>		
Subject Matter:			
The report should, to the extent reasonably possible, address each of the items listed in the table below.			
No	Subject	Description/Details	
1	The person(s) suspected of any Improper Conduct or involvement in Improper Conduct		
2	The nature of the suspected Improper Conduct (e.g. fraud, negligence or other Improper Conduct)		
3	The dates of the suspected Improper Conduct		
4	Any evidence of the suspected Improper Conduct (regardless of format) and the location of any other evidence		

Whistleblower Form		Date:	
		Received by:	
5	Details of any witnesses		
13	Any concerns of reprisals to you by making this report		
15	Any other details you consider relevant		
Personal details of Whistleblower OPTIONAL (It is recommended that you provide your contact details as you may need to be spoken to again if clarification or further information is needed)			
Name:			
Position:			
Location:			
Report to:			
Address:			
Home telephone no:			
Mobile:			
Home Email address:			

Schedule 2

Whistleblower Reporting Options

An Eligible Whistleblower is encouraged and expected to make a report if they have reasonable grounds to suspect Improper Conduct in relation to an IOOF Group company, as follows:

Option	Procedure
1	If the Whistleblower is comfortable doing so, they may report the matter to an Eligible Recipient who is an IOOF Employee using the day-to-day processes for reporting problems, such as speaking to a senior manager
2	If the Whistleblower is not comfortable using Option 1, or has already and is not satisfied the matter has been adequately dealt with, they may report the matter to one of the following persons: <ul style="list-style-type: none"> • the WPO (see section 5.2) • WIO (see section 7.1)
3	If the Whistleblower is not comfortable using Options 1 or 2, or has already and is not satisfied the matter has been adequately dealt with, they may report the matter to the External Whistleblower Officer by contacting the Whistleblower Hotline (section 6)
4	If the Whistleblower is not comfortable using Options 1 to 3, or has already and is not satisfied that the matter has been adequately dealt with, they may report the matter directly to a director (including the independent directors) of an IOOF Group company.
5	If the Whistleblower is not comfortable using Options to 1 to 4, or the Whistleblower has reasonable grounds to believe the Improper Conduct is likely to be a criminal offence, or has exhausted these options and is not satisfied that the matter has been adequately dealt with, they may report the matter, as appropriate, to: <ul style="list-style-type: none"> • the Australian Federal Police (AFP) • a regulator (e.g., ASIC or APRA)
6	If the Whistleblower is not comfortable using the internal reporting procedures, or has already and is not satisfied the matter has been adequately dealt with, they may report the matter to: <ul style="list-style-type: none"> • their lawyer • the External Whistleblower Officer (see section 6)