



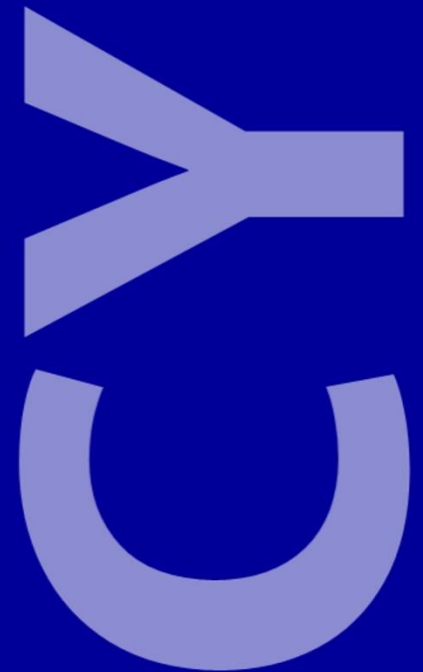
Rabobank

Rabobank Australia Local Policy

Whistleblowing

Version 5

Effective 23 October 2022



1. About this policy

1.1. Context

The Local Policy on Whistleblowing – Australia (“this Policy”) applies to Coöperatieve Rabobank U.A. Australia Branch, Rabobank Australia Limited and Rabo Australia Limited and any related bodies corporate collectively referred to as “Rabobank ” or “Rabobank Australia”.

Rabobank is committed to maintaining a high standard of business ethics and safety within its organisation. Rabobank promotes a strong culture of transparency and integrity and is committed to detecting and addressing misconduct and ensuring that those who become aware of misconduct can report it without being concerned that it will negatively affect them or their position.

Rabobank may amend this policy from time to time at its discretion and as required. To the extent that there are any inconsistencies between other internal global or local policies and this Policy, this Policy takes priority in relation to Rabobank.

Information and learning about this Policy and associated procedures is also made available to relevant persons through training sessions conducted periodically.

A copy of this Policy is accessible to all employees and officers of Rabobank via the [Policy House Portal](#) and to Board members on Diligent Boards.

1.2. Objectives

The objective of this Policy relates to the protection of individuals and groups of individuals that ‘speak up’ about misconduct (also known as ‘disclosers’) and how Rabobank will respond to reports of misconduct.

1.3. Who should use this policy?

Entities	All Australian entities (‘Rabobank Australia’ or ‘Rabobank’) <ul style="list-style-type: none">■ Rabo Australia Limited (and its subsidiaries)■ Coöperatieve Rabobank U.A. Australia Branch■ Rabobank Australia Limited
Scope	This Policy applies to anyone who works (or has worked) at Rabobank, in any role, location, or contract term, as well as anyone who has or had another type of business relationship with Rabobank (e.g. suppliers) and family members of current or past employees of Rabobank.
Key policy	Yes

2. Policy requirements

2.1. Making a report

2.1.1. What matters should be reported?

Requirements

- R1.** Conduct (disclosable matters under the Whistleblowing Legislation) that should be reported under this Policy includes:
- Reasonable grounds to suspect misconduct (which includes fraud, negligence, default, breach of trust and breach of duty);
 - Reasonable grounds to suspect an improper state of affairs in relation to Rabobank or any related body corporate of Rabobank;
 - Corrupt, fraudulent or other illegal conduct or activity;
 - Conduct involving substantial risk to public health or safety or the environment;
 - Conduct aimed to conceal records or other evidence related to any of the above.
 - An offence against or a contravention of:
 - *Corporations Act 2001* and Regulations;
 - *Australian Securities and Investments Commission Act 2001*;
 - *Banking Act 1959*;
 - *Financial Sector (Collection of Data) Act 2001*;
 - *Insurance Act 1973*;
 - *Life Insurance Act 1995*;
 - *National Consumer Credit Protection Act 2009*;
 - *Superannuation Industry (Supervision) Act 1993*;
 - An instrument made under any of the above Acts;
 - An offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. This would include conduct such as bribery of a Commonwealth Public Official; or
 - Conduct that represents a danger to the public or the financial system.
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- R2.** Rabobank encourages all employees, officers, contractors, intermediaries and agents to report any disclosable matters.
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- R3.** An Eligible Whistleblower will be protected even if the disclosure turns out to be incorrect. However disclosures that are not about the disclosable matters detailed above do not qualify for protection under the Corporations Act. That said, members of staff should also report any other conduct or activity that they reasonably believe poses a significant risk to Rabobank's employees, the community, property, operations or reputation (subject to matters listed under R4). Reports in relation to such conduct will entitle members of staff to the protections under this Policy even if the conduct reported is not a disclosable matter under the Whistleblowing Legislation. Examples of this type of conduct may be:
- A breach of the Rabobank Code of Conduct or other internal policies;
 - Unethical or dishonest conduct; or
 - Conduct in breach of any state or Commonwealth regulations or guidelines.
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Purpose

It is important that Rabobank is aware of key information about conduct that could impact its employees, customers, business, communities and reputation. These provisions are designed to encourage and support Rabobank's culture of transparency and speaking up.

2.1.2. What matters should not be reported?

Requirements

R4. Personal work-related grievances are not protected under the Whistleblowing Legislation and should not be reported under this Policy, including:

- Interpersonal conflict between employees;
- A staff member's dissatisfaction with their pay (unless the staff member's grievance relates to discriminatory conduct in some respect);
- A staff member's dissatisfaction with their performance feedback or results of their annual performance review (unless the staff member's grievance relates to discriminatory conduct in some respect);
- A staff member's failure to receive a promotion on grounds unrelated to discriminatory conduct.

Personal work-related grievances are generally those grievances about any matter in relation to the discloser's employment (or former employment), having (or tending to have) implications for the discloser personally.

R5. A personal work-related grievance may still qualify for protection if:

- It includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance;
- Rabobank has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- The staff member suffers from or is threatened with detriment for making a disclosure; or
- The staff member seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

2.1.3. Who to report conduct to

Requirements

R6. Reports can be made confidentially and anonymously at any time via the following methods:

- Via the secure confidential external hotline and portal provided by People Intouch (24 hours / 7 days) and can be accessed as follows:
Dial the toll free phone number 1800 452 051 (enter access code 22611) or via www.speakupfeedback.eu/web/th6pep/au (enter access code 22611).
- To the KPMG Australia external trusted person, Jessica Habib, Tel: +61 2 9346 5590 (work)
- Reports made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions are also protected.

- R7.** Disclosers are encouraged to report any disclosure via the methods set out above. The making of a report via any of these methods will mean that it has been made to an Eligible Recipient under the Whistleblowing Legislation. Under the Whistleblowing Legislation, disclosers may also report such information to the following additional Eligible Recipients (see R8 for additional Eligible Recipients in respect of tax-related disclosures):
- An officer of Rabobank and related bodies corporate including senior executives of Rabobank, the Chief Conduct and Integrity Officer Australia and New Zealand, and the board;
 - An auditor, or a member of an audit team conducting an audit of Rabobank or any related body corporate of Rabobank;
 - An actuary of Rabobank or any related body corporate of Rabobank;
 - Any person authorised by Rabobank to take disclosures; or
 - A member of the Group Executive Team of Rabobank Australia and New Zealand.

- R8.** Where the information to be reported relates to the tax affairs of Rabobank or an associate of Rabobank (a Tax Disclosure), disclosers are still encouraged to report any disclosure via the methods set out above. Additionally, the Whistleblowing Legislation allows disclosers to make Tax Disclosures to the following Eligible Recipients:
- A registered tax agent or Business Activity Statement (BAS) agent who provides tax agent services or BAS services to Rabobank;
 - A member of the Group Executive Team of Rabobank Australia and New Zealand; and
 - Any other employee or officer (within the meaning of the *Corporations Act 2001* of Rabobank who has functions or duties that relate to the tax affairs of Rabobank.

- R9.** Under the Whistleblowing Legislation, disclosers may also report disclosable matters to:
- The Australian Securities and Investments Commissions (ASIC);
 - The Australian Prudential Regulation Authority (APRA);
 - The Commissioner of Taxation (ATO) (in relation to Tax Disclosures); or
 - Any other prescribed Commonwealth authority or regulator.

However, if a whistleblowing report is made to one of these regulators, Rabobank will not automatically become aware of that report and therefore may not be able to respond to it in accordance with this Policy.

Purpose	To ensure all persons covered by this Policy understand who to contact with any disclosure of relevant matters.
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Related documents	Receiving a Whistleblowing Disclosure Information Sheet
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2.1.4. Anonymous disclosures

Requirements	R10. Disclosers are able to make an anonymous disclosure and they will still be entitled to the protections set out in this Policy and under the Whistleblowing Legislation if the other requirements for making the disclosure are complied with. If a discloser
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wants to maintain complete anonymity when making a disclosure, Rabobank suggests the discloser submits their disclosure on an anonymous basis via the methods outlined above in section 2.1.3, or if a disclosure is being made to any other Eligible Recipient listed above, that they refrain from telling others that they have filed a whistleblowing disclosure and submit their disclosure:

- From a computer not connected to Rabobank's network;
- By phone from an unlisted number; or
- By email using a private email address (e.g. like Gmail or another external email provider) and not one connected to Rabobank's network.

R11. A discloser can choose to remain anonymous while making a disclosure over the course of the investigation and after the investigation is finalised. A discloser can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. In addition, a discloser who wishes to remain anonymous is encouraged to maintain ongoing two-way communication with Rabobank, so that Rabobank can ask follow-up questions or provide feedback. Even if a discloser does not make the report on an anonymous basis, the person receiving the report is not permitted to reveal the identity of the discloser, or information that is likely to lead to the identification of the discloser, except in certain circumstances as set out in section 2.4.1 below.

It should be noted that if the discloser's identity is not provided when making a whistleblowing report, this:

- will prevent Rabobank from re-contacting the discloser confidentially to clarify or confirm information supplied (if the report is not submitted through the external hotline or online portal);
- may impact on Rabobank's ability to proceed with investigation (e.g. if there are gaps in information supplied that cannot be clarified directly in confidence with a discloser);
- will prevent Rabobank from updating the discloser on Rabobank's efforts taken in response to their disclosure, where appropriate; and
- may affect Rabobank's ability to take steps to protect the discloser from detriment.

2.1.5. Disclosures outside Rabobank

Requirements

R12. There are two categories of disclosure that a discloser may make (to a journalist or a Member of Parliament) and still obtain the protections of the Whistleblower Legislation. These are called 'Public Interest Disclosures' and 'Emergency Disclosures' and are defined in the Appendix. Making reports to others outside Rabobank will not obtain the protection of the Whistleblowing Legislation or any other protections provided by this Policy.

Unless a disclosure is being made under those provisions, speaking to a journalist or a Member of Parliament about confidential information in relation to Rabobank without authorisation is not permitted and may lead to disciplinary action.

2.2. Handling of reports

2.2.1. Investigation of reports

Requirements

R13. In order for the investigations and actions undertaken to be fair and unbiased, it may be necessary to:

- Obtain specialist, independent advice on areas outside the organisation's knowledge or expertise, including trained investigation staff from either inside Rabobank locally or globally, or refer the matter confidentially to a third-party investigation firm, if deemed appropriate having regard to the nature of the disclosed matters;
- Appoint a person to assist in the investigation of a matter that is the subject of a report; or
- Refer the matter to the police or law enforcement where disclosures refer to criminal behaviour.

R14. In the conduct of an investigation, Rabobank may proceed as follows:

- Speak to anyone who may be affected or involved in the disclosure so that they are provided with the opportunity to respond to the allegation(s);
- Consider these responses; and
- Speak to witnesses (where there is a dispute as to the facts surrounding the allegations).

Subject to all legal and organisational requirements and any wellbeing considerations, Rabobank will consider the working arrangements of affected persons including but not limited to any need for a paid leave of absence.

R15. Rabobank is not obliged to reopen an investigation and may conclude a review if it finds that the investigation was conducted properly, or that new information is either not available or would not change the findings of the investigation.

Purpose

To confirm that all disclosures will be reviewed and, where appropriate, investigated at the earliest opportunity. Any findings will be managed promptly. The way a disclosure is managed depends on what it involves and will be dealt with on a case-by-case basis.

Related documents

[Whistleblowing Case Management Procedure Rabobank Australia and Rabobank New Zealand](#)

2.2.2. Personal interests

Requirements

R16. A discloser is encouraged to reveal, at the outset, any personal interest or involvement they may have in the matter being disclosed. A failure to disclose any personal interests will not prevent the reported disclosure being investigated pursuant to this Policy.

2.2.3. Fair treatment of employees that are the subject of a disclosure

Requirements

R17. Fair treatment of those persons implicated in a misconduct disclosure includes but is not limited to the following:

- The opportunity to be 'heard' and respond to the allegations against them before any adverse findings are made; and

- The opportunity to have their responses considered by Rabobank and, in appropriate circumstances, investigated.

R18. During any investigation into a report of disclosable matters, Rabobank extends support and protection to employees, officers and others engaged by Rabobank and implicated in the report until such investigation has concluded and claims have been proven or dismissed. Any suspected adverse or detrimental treatment in this regard should be reported via the methods set out in section 2.1.3 so that these matters may be addressed.

R19. Rabobank will endeavour to respond promptly to any complaints raised by parties who are the subject of a disclosure where such party has concerns about unfair treatment in the context of assessment of, and investigation into, the disclosable matter.

Purpose

To confirm that Rabobank is committed to ensuring the fair treatment of employees and other persons engaged by Rabobank who are mentioned in reports of disclosable matters, or to whom such disclosures relate.

2.2.4. Providing updates to those making misconduct disclosures

Requirements

R20. Rabobank will keep the discloser informed of the progress and/or outcome of the investigation, subject to the considerations of privacy of the individuals against whom the allegations have been made and if the discloser can be contacted including through anonymous channels. Any updates supplied to a discloser may need to be limited where appropriate, for reasons including to preserve the confidentiality of an investigation and the privacy of those potentially affiliated, named, implicated or associated with the matters disclosed. The frequency and detail of any updates supplied (where appropriate), and the initiation or resolution of any potential subsequent investigation, may vary according to the matters reported and the context of the misconduct disclosed.

R21. Where claims cannot be substantiated, and the discloser's identity is known, Rabobank reserves the right to deem a disclosure closed and notify the discloser accordingly.

2.2.5. Discloser involvement after a disclosure

Requirements

R22. Any disclosers who reveal their identity may be asked to participate in subsequent confidential interview(s) in relation to the claims made in the disclosure including to clarify facts supplied in order to proceed with further investigation. No adverse consequences will result for a discloser if they choose to suspend co-operation or if, following investigation, a disclosure they made on reasonable grounds could not be substantiated. If a discloser believes they are being adversely treated or have been subject to some detriment in these instances, they should report their concerns via the methods set out in section 2.1.3 so that these matters may be addressed.

2.2.6. Proven misconduct

Requirements

R23. Rabobank reserves the right to institute performance management or take other disciplinary action, including termination of employment or engagement, in relation to those found to have committed corporate misconduct.

Rabobank also reserves the right to refer matters to law enforcement or regulatory bodies at any time should the misconduct in Rabobank's reasonable opinion warrant such a referral.

Purpose To clarify the actions that Rabobank may take in relation to misconduct.

2.3. False reports

2.3.1. Consequences for knowingly making false reports

Requirements **R24.** Disclosers must have reasonable grounds for the claims made in their disclosures. Where it is shown that a person has knowingly made a false allegation of improper conduct, the making of that report will be considered a serious matter and may render the person concerned in breach of Rabobank's Code of Conduct and/or subject to disciplinary proceedings which may include demotion, suspension or termination of employment.

R25. No action will be taken against an employee who makes a report based on reasonable grounds to suspect misconduct or an improper state of affairs, which is not substantiated in a subsequent investigation.

2.4. Protection and support of disclosers

2.4.1. Protecting confidentiality

Requirements **R26.** A member of staff may choose to make a report on an anonymous basis, however, if they choose to disclose their identity and are an Eligible Whistleblower who is making a disclosure protected by the Whistleblowing Legislation via the methods set out above or to other Eligible Recipients, the recipient has an obligation to keep their identity confidential. This includes keeping confidential information which could lead to the disclosure of their identity.

R27. Rabobank has the legal right to share a discloser's identity, if reasonably necessary, to refer an incident to authorities (such as ASIC, APRA and the Australian Federal Police) who may wish to pursue the matter. Under the Whistleblowing Legislation, it is also permissible to disclose:

- Information regarding the suspected or actual wrongdoing disclosed, without revealing the discloser's identity or information that is likely to lead to the identification of the discloser;
 - Information other than the discloser's identity, if it is reasonably necessary for the purposes of the investigation and all reasonable steps are taken to reduce the risk that the discloser will be identified;
 - The identity of a discloser or information likely to lead to his or her identification to a legal practitioner for the purposes of obtaining legal advice or representation; or
 - The identity of a discloser where such disclosure is made with the consent of the discloser.
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R28. In order to allow proper investigation of the matter, and to provide appropriate support to the discloser, we may ask a discloser to consent to the disclosure of their identity to specific individuals or relevant teams, such as:

- The Rabobank global “Trusted Committee”;
- The Rabobank global Bureau Speak Up, which consists of internal experts on, amongst others, Compliance and Human Resources. The Head of the Investigations Department acts as the chairperson of the Bureau;
- The Rabobank Internal & Regulatory Investigations team (IRI) team locally or globally; and
- Any other persons reasonably necessary for the purposes of investigating matters the subject of a disclosure.

R29. Any information released in breach of this Policy will be treated seriously and may result in disciplinary action up to and including dismissal. A breach of this Policy may in certain circumstances also result in criminal sanctions.

2.5. General protections

Requirements

R30. Rabobank will not tolerate any detriment caused, or threatened to be caused, against any person who has made or who is believed to have made a report regarding disclosable matters. Under the Whistleblowing Legislation, "detriment" is defined to include, without limitation, any of the following:

- Dismissing the employee;
- Injuring the employee in their employment, (e.g. not giving an employee legal entitlements such as pay or leave);
- Changing an employee's job to their disadvantage;
- Offering a potential employee different (and unfair) terms and conditions for the job, compared to other employees;
- Discriminating between employees to the disadvantage of a whistleblower;
- Harassment or intimidation of a person;
- Harm or injury to a person, including psychological harm;
- Not hiring someone because they have been a whistleblower;
- Damage to a person's property, reputation, business or financial position; or
- Any other damage to a person.

R31. Any victimisation, retaliation or detriment caused or threatened to be caused in reprisal for a report regarding disclosable matters being made under this Policy will be treated as misconduct and may result in disciplinary action, which may include dismissal (or termination of engagement).

2.5.1. Support of disclosers

Requirements

R32. In order to support disclosers both during, and following the making of a disclosure, Rabobank encourages disclosers to make use of Rabobank's Employee Assistance Program (EAP). Details of the EAP and EAP provider can be found on the intranet:

<https://raboweboc.sharepoint.com/sites/service-HumanResources/SitePages/Employee-Assistance-Program.aspx>

R33. A discloser (or any other employee or person) can seek compensation and other remedies through the courts if:

- They suffer loss, damage or injury because of a disclosure; and
- Rabobank failed to prevent a person from causing the detriment.

Rabobank encourages disclosers to seek independent legal advice before making a disclosure.

Purpose

Rabobank firmly believes that those who reasonably suspect or witness misconduct should be able to report their suspicions with the confidence that they will be supported, and not punished or discriminated against, for making a disclosure. Disclosers are encouraged to raise any concerns arising out of a disclosure (or anticipated disclosure) or any subsequent investigation process via the methods set out in section 2.1.3 so that these matters may be addressed. A discloser can also lodge a complaint about any breach of confidentiality with a regulator such as ASIC, APRA or the ATO for investigation.

2.5.2. Criminal or civil liability

Requirements

R34. An Eligible Whistleblower will be protected from civil, criminal and administrative liability for making the relevant disclosure. However, the Eligible Whistleblower is not protected from civil or criminal liability for any of his or her conduct which may be revealed by the report. However, if an Eligible Whistleblower reports such conduct and actively cooperates in an investigation in which they may be implicated, there may be some cases where the fact they have made a report will be taken into account as a mitigating factor when determining actions that may be taken against them.

2.6. Compliance with this policy

Requirements

R35. Breaches or suspected breaches of this Policy should be reported via the methods set out in section 2.1.3. A breach of this Policy may result in disciplinary action up to and including termination of employment or engagement. As indicated above, a discloser can also lodge a complaint about any breach of confidentiality with a regulator such as ASIC, APRA or the ATO for investigation.

2.7. Monitoring and testing

Requirements

R36. With an effective whistleblowing program, Rabobank is able to demonstrate an environment where disclosers can safely make disclosures in the event that they have a concern.

Given the sensitivities that apply to the whistleblowing program and privacy requirements and to ensure consistent implementation of recommendations and controls, the monitoring and testing of the local whistleblowing program also operates globally as part of the global whistleblowing program managed as part of the Global Compliance Framework.

2.8. Record keeping

Requirements **R37.** Information collected in relation to the requirements of this Policy must be treated in accordance with the Local Policy on Data Management and related standards.

Related documents Local Policy on Data Management and related standards.

2.9. Personal data

Requirements **R38.** Personal data collected and stored in relation to the requirements of this Policy must be treated in accordance with the Local Policy on Privacy and related standards.

Related documents Local Policy on Privacy and related standards

Appendix 1: Background

A1.1. Laws and regulations

Under Australian legislation there are specific provisions which provide whistleblowers with legal rights (including protections) in relation to certain types of disclosures. For Rabobank, the relevant legislation, collectively referred to as “Whistleblowing Legislation”, is as follows:

	Name
Legislation	Sections 1317AA to 1317AJ of the <i>Corporations Act 2001</i>
	Sections 14ZZT to 14ZZE of the <i>Taxation Administration Act 1953</i>
Regulations and guidelines	<i>Corporations Regulations 2001</i>
	ASIC Regulatory Guide 270: Whistleblower Policies
	ASIC Immunity Policy

The protections under the Whistleblowing Legislation only apply to certain types of disclosures (“Qualifying Disclosures”). See definitions in the Appendix for additional information.

While this Policy contains a summary of parts of the Whistleblowing Legislation, for further detail, refer to the text of this legislation. This Policy is not intended to override any rights or obligations under the Whistleblowing Legislation.

A1.2. Related policies and standards

	Name
Global policy	Global Policy on Whistleblowing
	Rabobank Code of Conduct

Appendix 2: Definitions

Term	Definition
Eligible Recipient	A person referred to in R, 7, or 8 of this Policy in relation to a relevant disclosure type.
Eligible Whistleblower	<p>A person is an Eligible Whistleblower (including in relation to Tax Disclosures) if they are, or have been:</p> <ul style="list-style-type: none"> ■ An officer of Rabobank (this includes directors of the board and the company secretary of Rabobank); ■ An employee of Rabobank; ■ An individual who supplies services or goods to Rabobank (whether paid or unpaid); ■ An employee of a supplier of services or goods to Rabobank (whether paid or unpaid); ■ An individual who is an associate of Rabobank (this includes directors and secretaries of both Rabobank and any related bodies corporate); ■ A spouse, child or other relative of an individual listed above; or ■ A dependant of any individual listed above.
Emergency Disclosure	<p>Disclosure made to a journalist or a Parliamentarian, which is eligible for protection if:</p> <ul style="list-style-type: none"> ■ the whistleblower has previously made a disclosure to ASIC, APRA or any other prescribed Commonwealth authority; ■ the whistleblower has 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; and ■ the whistleblower gives the body to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that the whistleblower intends to make an emergency disclosure. <p>For Emergency Disclosures the extent of the information disclosed must be no greater than is necessary to appropriately inform the recipient of the relevant misconduct or substantial imminent danger.</p>
Public Interest Disclosure	<p>Disclosure made to a journalist or a Parliamentarian, which is eligible for protection if:</p> <ul style="list-style-type: none"> ■ the whistleblower has previously made a disclosure to ASIC, APRA or any other prescribed Commonwealth authority; ■ at least 90 days have passed since the disclosure was made to ASIC, APRA or any other prescribed Commonwealth authority; ■ the whistleblower does not have reasonable grounds to believe that action is being taken to address the matters to which the previous disclosure related; ■ the whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest; and

Term	Definition
	<ul style="list-style-type: none"> ■ following the end of the 90 day period, the whistleblower gives the body to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that the whistleblower intends to make a public interest disclosure.
<p>Qualifying disclosure</p>	<p>A matter disclosed by an Eligible Whistleblower to an Eligible Recipient where the Eligible Whistleblower has reasonable grounds to suspect:</p> <ul style="list-style-type: none"> ■ misconduct (which includes fraud, negligence, default, breach of trust and breach of duty); or ■ an improper state of affairs in relation to Rabobank or any related body corporate of Rabobank. <p>including:</p> <ul style="list-style-type: none"> ■ An offence against or a contravention of: <ul style="list-style-type: none"> - the Corporations Act 2001 (and Regulations; - the Australian Securities and Investments Commission Act 2001 (; - the Banking Act 1959; - the Financial Sector (Collection of Data) Act 2001; - the Insurance Act 1973; - the Life Insurance Act 1995; - the National Consumer Credit Protection Act 2009; - the Superannuation Industry (Supervision) Act 1993; - an instrument made under any of the above Acts; ■ An offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. This would include conduct such as bribery of a Commonwealth Public Official; or ■ Conduct that represents a danger to the public or the financial system. ■ Misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Rabobank or an associate of Rabobank.

Appendix 3: Policy management

A3.1. Key Stakeholders

Policy owner	Group Executive Chief Compliance Officer, Region Australia, New Zealand
PDM representative	Senior Manager, Compliance Framework and Policies
Author	Chief Conduct and Integrity Officer Australia and New Zealand and Customer Advocate Australia
Reviewers	Head of Compliance Strategy, Framework & Governance, Region Australia, New Zealand Legal Counsel, Group Legal Australia and New Zealand
Approving body	Rabobank Australia Limited (RBAL) Board Senior Officer Outside Australia (SOOA) on behalf of RBAB Rabo Australia Limited (RAL) Board

A3.2. BEAR accountability

Business unit or functional team	Accountable staff
Compliance	Group Executive, Chief Compliance Officer
Internal Audit	Group Executive, Chief Audit Officer
Risk	Group Executive, Chief Risk Officer
Finance & Control	Group Executive, Chief Financial Officer
Human Resources	Group Executive, Chief HR Officer
COO	Group Executive, Chief Operating Officer
Wholesale Banking	Group Executive, Wholesale Banking
Country Banking	Group Executive, Country Banking
CEO	Chief Executive Officer
Treasury	Head of Treasury

A3.3. Accountability for implementation

Business unit or functional team	Accountable staff
Compliance	Group Executive, Chief Compliance Officer Australia and New Zealand
Conduct and Integrity	Chief Conduct and Integrity Officer, Australia and New Zealand

Business unit or functional team	Accountable staff
Internal Audit	Group Executive, Chief Audit Officer
Treasury	Head of Treasury
Legal	Head of Legal, General Counsel
Risk	Group Executive, Chief Risk Officer
Finance & Control	Group Executive, Chief Financial Officer
Human Resources	Group Executive, Chief HR Officer
COO	Group Executive, Chief Operating Officer
Wholesale Banking	Group Executive, Wholesale Banking
Country Banking	Group Executive, Country Banking
EPMO	Head of Enterprise Portfolio Management

A3.4. Key milestones

Approved	23 October 2022
Implementation start date	23 October 2022 no additional training required for implementation
Targeted completion date	23 October 2022 no additional training required for implementation
Review cycle	Biennial
Next review date	23 October 2024

A3.5. Revision history

Version	Date	Description of changes
1.0	28 May 2019	Approved by RBAL Board. <ul style="list-style-type: none"> Local policy developed following the implementation of the Global Policy on Whistleblowing and local legislation. This policy replaces the existing "Speaking Up Policy RANZG".
2.0	28 November 2019	Approved by RBAL Board (27 November 2019) and SOOA (28 November 2019). <ul style="list-style-type: none"> Updated in alignment with regulatory amendments.
3.0	3 December 2020	Approved by RBAL Board (28 October 2020), SOOA (30 November 2020) and RAL Board (3 December 2020).

Version	Date	Description of changes
		<ul style="list-style-type: none">■ Scheduled annual policy review. Changes includes alignment with the PPM format and roles and responsibilities descriptions. Additional links to information sheet and procedure included in the Policy.
4.0	2 February 2022	Approved by Group Executive, Chief Compliance Officer (Policy Owner). <ul style="list-style-type: none">■ Approved with minor changes only. Reference to ASIC's Immunity Policy added to Governing External Laws and Regulatory Guidelines section and updated link to this Policy on the Policy House Portal.
5.0	23 October 2022	Approved by RBAL Board and SOOA. <ul style="list-style-type: none">■ Converted to the updated PDM policy template■ Updated to further align with regulatory amendments and industry best practice per Deloitte review recommendations.