

## **Sunsuper Pty Ltd**

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Sunsuper Pty Ltd  
Sunsuper Superannuation Fund  
Sunsuper Financial Services Pty Ltd  
Sunsuper Pooled Superannuation Trust  
Precision Administration Services Pty Ltd

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## **Whistleblower Policy**

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**March 2021**

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## 1. Overview

This policy outlines Sunsuper's policy in relation to whistleblower matters. At Sunsuper we have strong values and are committed to conducting business with the highest standards of personal and corporate integrity, responsibility, openness and accountability. We believe that our strong values support our success and represent one of our most valuable assets.

We all share a collective responsibility to do the right thing in all business matters. This shared duty is the cornerstone of Sunsuper's outstanding reputation, and the foundation of our past and future successes.

Within our organisations we do not tolerate misconduct, including fraudulent, unethical, illegal or corrupt conduct by our employees, contractors or service providers. Nor do we tolerate the taking of reprisals against those who come forward to disclose such conduct.

We recognise the value of transparency and accountability in our administrative and management practices, and strongly encourage persons who work with and for us to make disclosures that reveal an improper state of affairs, including misconduct or fraudulent, unethical, illegal or corrupt conduct.

Under the *Corporations Act 2001* there are obligations relating to the protection of individuals that make disclosures. This legislation requires Sunsuper to maintain a whistleblower policy meeting prescribed requirements as both a large proprietary company and as a proprietary company that is a trustee of a registrable superannuation entity.

There are also provisions in the *Taxation Administration Act 1953* in regards to whistleblowers who report misconduct or an improper state of affairs in relation to tax affairs of entities regulated under the act.

## 2. Purpose

The purpose of this policy is to ensure all current and former employees, contractors and service providers are aware of the channels available for reporting misconduct, the process that will be followed following a disclosure, and the protection for disclosers. The policy will also provide guidance on the types of matters that can be disclosed that are eligible for protection under whistleblower legislation.

## 3. Scope and Availability

In accordance with legislation this policy applies to all eligible whistleblowers. This includes all individuals who are currently or who have previously been employees, contractors and service providers of the Sunsuper Group, including Precision Administration Services Pty Ltd (PAS) and Sunsuper Financial Services Pty Ltd (SFS), or of our custodian, or investment managers.

Furthermore, this extends to current or former relatives, dependants, or dependants of the spouse of any of these individuals.

This policy is made available to all employees and contractors via the Sunsuper intranet. New starters are made aware of the policy as part of their induction material and existing employees receive information on the policy as part of their annual compulsory training. The EthicsLine service is promoted via awareness communications via email and the intranet, and via promotional posters positioned around the Sunsuper offices. It is also referenced in the Fraud Control Plan and Code of Conduct policies.

Service providers are provided information about EhticsLine when they are registered with Sunsuper as a vendor. The policy is available on the public website.

This policy does not cover members of Sunsuper Superannuation Fund, unless they also otherwise fit into the scope an eligible whistleblower.

For complaints in relation to Sunsuper, members should follow the established formal complaints process. Any information that an individual who is not an eligible whistleblower wants to disclose to Sunsuper, relating to misconduct directed at Sunsuper by a third party can be taken anonymously by Sunsuper customer service staff and escalated accordingly.

#### 4. Definitions

For the purposes of this policy the term 'relative', in relation to scope of family members who are eligible whistleblowers, includes parents, children, siblings, remoter issue or remoter lineal ancestor of the person.

#### 5. Policy

All employees, contractors and service providers that have reasonable grounds to suspect misconduct or an improper state of affairs in regards to the Sunsuper group need to make disclosures. Eligible whistleblowers are able to make disclosures anonymously and are strongly encouraged to do so if they are more comfortable making a disclosure this way. The Sunsuper EthicsLine, which is independently operated, can be used for making anonymous disclosures.

##### 5.1. Conduct that Should be Reported

Sunsuper seeks to ensure any misconduct or improper state of affairs is uncovered and addressed. One prominent area of concern is occupational fraud, which refers to the use of one's occupation for personal enrichment through deliberate misuse of an organisation's resources. It also involves deceit or other dishonest conduct involving acts, omissions or the making of false statements, orally or in writing, with the object of obtaining money or other benefits, or of evading a liability. Other types of misconduct and fraudulent, unethical, illegal or corrupt conduct include:

- Dishonesty;
- Theft, misuse or embezzlement of assets (including cash and intellectual property);
- Breach of fiduciary duties (e.g. not acting in the best interests of a client or the organisation);
- Falsification of financial statements or records;
- Conflicts of interest, including those that arise in connection with the *Conflict of Interest - Personal Relationships Policy* (e.g. self-interest, personal gain);
- Kickbacks, secret commissions or bribes;
- Violations of laws or regulations;
- Conduct that represents a danger to the public or financial system;
- Modern Slavery (please refer to the *Modern Slavery Framework*)
- Workplace violence, bullying or harassment; and
- Other misconduct or any matter leading to an improper state of affairs.

A matter does not have to contravene a law to be a disclosable matter.

##### 5.2. How to Make a Disclosure

Disclosures can be made through Sunsuper's dedicated whistleblower hotline, EthicsLine, details of which are below.

Alternatively disclosures can be made directly to eligible recipients which include Sunsuper executives, auditors, directors, actuaries or company secretary. Sunsuper considers any member of management in an Executive position to be considered senior management, based on the definition in the *Corporations Act 2001*.

Sunsuper encourages disclosures to be made via the EthicsLine channel, which is dedicated for this purpose, however if someone wishes to raise a matter with another eligible recipient this can be done so via bringing the matter to their attention confidentially in a contact channel of choice e.g. phone, face to face, email or written correspondence.

Disclosures can also be made to ASIC or APRA and will be protected even if a disclosure was not previously made via Sunsuper internal channels. Refer to Appendix 1 FAQ for more information.

Disclosures made to other recipients will not qualify for protection under whistleblower legislation apart from the below exceptions.

*5.2.1. Legal Practitioner*

Disclosures can be made to a legal practitioner for the purpose of obtaining legal advice or legal representation in regards to the matter. Protection in this instance still applies as far as disclosing to the legal practitioner goes, even if the practitioner determines that the matter is not a “disclosable matter” as part of providing legal advice.

*5.2.2. Public Interest Disclosure*

If an individual has already made a disclosure to ASIC or APRA, at least 90 days have passed since the disclosure was made, and the individual does not have reasonable grounds to believe that action is being taken to address the matter then a public interest disclosure may be made. The individual must give written notice to the recipient of the original disclosure that they intend to make a public interest disclosure in relation to the matter, and they must have reasonable grounds to believe that making the further disclosure would be in the public interest.

If all of these criteria are met then a disclosure can be made to a member of parliament or a journalist. It is important for a discloser to understand the criteria and so should consider seeking legal advice before making a public interest disclosure.

*5.2.3. Emergency Disclosure*

If an individual has already made a disclosure to ASIC or APRA and they have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment then an emergency disclosure may be made. The individual must give written notice to the recipient of the original disclosure that they intend to make an emergency disclosure in relation to the matter.

If all of these criteria are met then a disclosure can be made to a member of parliament or a journalist. It is important for a discloser to understand the criteria and so should consider seeking legal advice before making an emergency disclosure.

*5.2.4. Disclosures Relating to Tax Affairs*

A disclosure can be made directly to the ATO and qualify for protection as outlined in this policy, if the discloser considers that the information may assist with the ATO's duties under a taxation law in regards to the Sunsuper group. This provision is under the *Taxation Administration Act 1953* and narrows the concept of a relative being an eligible whistleblower to only spouse or child.

Under this legislative provision, specific to the *Taxation Administration Act 1953*, public interest and emergency disclosures do not apply.

**5.3. EthicsLine**

To support enabling people who work with and for Sunsuper to report misconduct EthicsLine has been established.

EthicsLine provides a confidential hotline service that current or former employees, contractors and service providers can use to anonymously report misconduct, including fraudulent, unethical, illegal or corrupt conduct, or an improper state of affairs, as well as any

perceived or actual conflicts of interest, to an independent third party. EthicsLine has been established to:

- Foster a culture of ethical behaviour;
- Assist with the detection and management of conflicts of interest;
- Deter, detect and prevent misconduct, including fraudulent, unethical, illegal or corrupt conduct;
- Enhance compliance with laws and regulations;
- Reduce losses and liability; and
- Provide a low-risk way for people to voice concerns.

EthicsLine represents an option for people who feel uncomfortable coming forward face-to-face to discuss inappropriate conduct. By contacting the hotline, these people can access a skilled forensic specialist who can get the necessary information to assess, and if necessary investigate, an allegation on a confidential basis.

EthicsLine provides people who contact the hotline with the right to remain anonymous; all disclosures are treated in a highly confidential manner. There are certain protections in place for those persons who make disclosures.

EthicsLine is managed by Deloitte, one of the world's largest assurance and advisory services firms. The use of an external party to operate EthicsLine provides independence and expertise in the assessment and investigation of disclosures of fraudulent, unethical, illegal or corrupt conduct.

EthicsLine is available 24 hours a day, 7 days a week through multiple dedicated contact channels.

- Toll-free number: 1800 945 100
- Web: [www.sunsuperethicsline.deloitte.com.au](http://www.sunsuperethicsline.deloitte.com.au)
- Email: [sunsuperethicsline@deloitte.com.au](mailto:sunsuperethicsline@deloitte.com.au)
- Fax: +61 3 9691 8182
- Reply paid post: Ethicsline, Reply paid 12628, A'Beckett Street, Melbourne, VIC, 8006

All disclosures to EthicsLine will be handled by independent forensic specialists from Deloitte.

#### 5.4. Investigation of Disclosures

Deloitte reports the results of all disclosures it receives via EthicsLine to the Conflicts Investigations Committee (CIC), which is comprised of the Chair of the Audit Compliance and Risk Management Committee (ACRMC), the General Counsel and the Chief Risk Officer. The Deputy Chair of the Board will deputise in the absence of the Chair of the ACRMC.

Any disclosures made directly to other authorised persons outlined in this policy should be reported by those persons through the EthicsLine Eligible Recipients Portal. This portal allows the recipient of a disclosure to capture the information securely where it will then be managed and escalated by Deloitte in the same way as a direct EthicsLine disclosure. This process ensures the matter is handled appropriately and in line with our obligations.

The CIC is responsible for:

- Acting as the contact point for general information and advice;
- Reviewing and initially assessing all disclosures;
- Carrying out, or appointing an investigator to carry out, an investigation into a disclosure;
- Overseeing an investigation of a disclosure where an investigator has been appointed;
- Facilitating the appointment of a welfare manager to support the discloser, if required;
- Liaising with the directors and senior management as appropriate; and
- Reporting to and forming recommendations to the Board (or ACRMC as delegate), who have responsibility for decisions following an investigation.

If it is apparent to Deloitte, that a member of the CIC is the subject of, implicated or involved in a reported matter, the matter will be reported to the other members of the committee or directly to the Board of Directors.

Any committee member implicated or directly involved in reported matters will be recused and will not participate in the committee work on that matter. The committee may appoint another, independent, member of management or the Board to replace the recused member.

Investigations will include reviewing evidence and if applicable collecting information and/or interviewing any parties that may have been involved or been witness to the alleged misconduct. Once the Committee has satisfied themselves in regards to the investigation next steps will be determined on a case by case basis depending on the outcome and what action is deemed appropriate. The CIC will aim to complete investigations within 60 days but the process and timeframe may vary depending on the nature of the disclosure.

Disclosers will be provided with regular updates if they can be contacted. Updates can be provided through EthicsLine enabling the discloser to remain anonymous yet receive information. Frequency and timeframe of updates may vary depending on the nature of the disclosure and required investigation. A discloser will be notified when an investigation has been completed. How much detail they receive regarding the outcome of the investigation will depend on the situation.

Investigations and findings are documented in the EthicsLine platform. Disclosures and investigation findings are reported to the ACRMC and Board with de-identified information to preserve the anonymity or confidentiality of the discloser.

#### 5.5. Protection for Disclosers

It is essential that individuals who identify or suspect reportable conduct report that conduct. We take all reasonable steps to protect those making such reports from reprisals, including taking appropriate disciplinary action against the person(s) responsible for any reprisals.

There is legislative protection in place for an eligible whistleblower making a disclosure about a disclosable matter to an eligible recipient. These concepts are outlined earlier in this policy.

##### *5.5.1. Anonymity and Confidentiality*

When a disclosure is made to an eligible recipient, under legislation that recipient must keep the identity of the person who made the disclosure confidential unless the discloser gives their consent to be identified, or unless the recipient discloses the identity to APRA, ASIC, ATO or the Australian Federal Police as applicable as part of the investigation or to a legal practitioner for the purposes of obtaining legal advice or representation. This also relates to the recipient passing on information that is likely to lead to the identification of the discloser unless it is reasonably necessary for the purposes of investigating a matter.

The CIC will, to the extent feasible, investigate disclosures in such a manner so as not to identify the person who has made the disclosure.

A discloser is able to remain anonymous throughout the investigation and afterwards and will still be protected.

If a discloser feels that there has been a breach of confidentiality, a complaint can be made to the Chair of the CIC for investigation, or alternatively to the CEO. A discloser can also lodge a complaint with a regulator (ASIC, APRA or ATO).

### 5.5.2. *Victimisation*

We are committed to the protection of persons making disclosures made on reasonable grounds against detrimental action and victimisation, even if the disclosure is subsequently determined to be incorrect or is not substantiated.

The term 'detrimental action' means action taken against a person in reprisal for a disclosure made, or because there is a suspicion or belief that a disclosure has been, or might be made. Detrimental action includes dismissal, demotion, any form of intimidation or harassment, harm or injury to a person (including psychological harm), discrimination, bias and/or action causing injury, loss or damage (including to a person, a person's property, a person's reputation, or a person's business or financial position). It is not acceptable to discriminate, disadvantage or adversely treat a person or their employment, career, profession, trade or business for the purposes of reprisal for a disclosure made through EthicsLine or any other channel.

The CIC is responsible for working with the Board of Directors and executives to ensure reasonable measures are taken to protect those who make a disclosure from direct or indirect detrimental action or victimisation. The CIC will assess the risk of detrimental action as part of initial review of a disclosure. Reasonable measures for protection will be case by case but could include the discloser performing their duties from another location, performing in another role, or taking extended leave.

Disclosers can report incidents of detrimental action to the CIC. The CIC will assess the report as a new disclosure. Where the CIC are satisfied that the action has occurred, they will refer the matter to an investigator as appropriate, and if the claim is substantiated, appropriate disciplinary action will be taken.

The protection in regards to detrimental action also applies if there is conduct that constitutes the threat of detrimental action even if the action hasn't been carried out.

In certain circumstances the courts can make orders in regards to compensation for individuals who have been the victims of detrimental action in regards to an actual or suspected disclosure if the individual has suffered a loss, damage or injury because of the disclosure and Sunsuper failed to take reasonable precautions to prevent the detrimental conduct. Disclosers are encouraged to seek independent legal advice if they are seeking compensation.

Detrimental action does not include steps taken to protect a discloser such as relocation to another team following a disclosure about their team. It also does not include activity unrelated to a disclosure such as performance management in line with internal policies.

### 5.5.3. *Protection from Liability*

If a person makes a disclosure they are not subject to any civil or criminal liability, or disciplinary action for making the disclosure.

If someone makes a disclosure in relation to any wrong doing or misconduct that they have been involved in, making the disclosure does not shield that person from the reasonable consequences of their own involvement in any wrongdoing.

If the disclosure is made to ASIC and meets the requirements under the ASIC Immunity Policy, an individual can, in certain circumstances, seek immunity from both civil and criminal proceedings. This will only be available to the first individual to report the misconduct and applies to limited types of misconduct related to dishonest conduct when operating financial services, market manipulation and insider trading.



The ASIC Immunity Policy, policy FAQ's and how to make an application for immunity can be found on ASIC's website.

Information disclosed by a person to ASIC, APRA, ATO or as an emergency or public interest disclosure concerning suspected misconduct, an improper state of affairs, or other reportable matters may not be used as evidence in any criminal proceedings against that person, or in proceedings for the imposition of a penalty, except for in any action about falsity of information submitted. In addition, there may be some cases where the fact that a disclosure has been made will be taken into account as a mitigating factor when considering disciplinary or other action.

Disciplinary action against a person making a disclosure where they have been involved in wrongful conduct is not considered retribution or detrimental action where there are grounds that would justify the taking of the action against the person had a disclosure not been made.

#### *5.5.4. Additional Support*

Individuals that make disclosures may require additional support from Sunsuper depending on the circumstances. On a case by case basis Sunsuper will work with a discloser to consider and determine appropriate support. This may include referral to the Sunsuper Employee Assistance Program which is a counselling service offered to Sunsuper employees.

## **6. Related Policies and Guidelines**

- Code of Conduct and Ethics Policy;
- Personal Relationships in the Workplace Policy;
- Conflicts Management Policy;
- Discrimination & Workplace Bullying Policy
- Modern Slavery Framework;
- Restricted Trading Policy - Personal Trading;
- Restricted Trading Policy - Sunsuper Trading;
- Sexual Harassment Policy; and
- Fraud Control Plan.

## **7. Technical**

This Whistleblower Policy must be reviewed at least annually (or as close to annually as is practicable) by the Audit, Compliance and Risk Management Committee (ACRMC). A review must also take place if there is a material change to business operations or regulatory requirements impacting on this policy.

Initial policy review will be conducted by the Chief Risk Officer, with any recommended changes being formally submitted to the ACRMC for consideration and subsequent adoption.

## **8. Appendices**

- Appendix 1 - EthicsLine and making disclosures - Frequently Asked Questions.

## **Appendix 1: EthicsLine and Making Disclosures - Frequently Asked Questions**

### What should I consider before contacting EthicsLine?

Before you contact EthicsLine, consider the following:

- Does the matter involve fraudulent, unethical, illegal or corrupt conduct, other misconduct, or a perceived or actual conflict of interest?; or
- Is EthicsLine the best channel to use to disclose the situation?

### What is EthicsLine not to be used for?

EthicsLine is not to be used in the following situations:

- Complaining about your job or remuneration issues;
- Discussing performance issues;
- Raising industrial relations issues; and
- Reporting personal (not work-related) matters. A personal matter is a matter that arises outside of work and does not involve anyone connected to Sunsuper.

While all disclosures received will be reported to the CIC, inappropriate calls will generally not be investigated. In these instances, the person making the disclosure will be advised to direct their concerns through a more appropriate channel.

As these items are not disclosable matters they do not qualify for protection under whistleblower legislation. However if a personal work related grievance report includes information indicating misconduct, a breach of employment laws, has significant impacts for Sunsuper or relates to detriment to the discloser then this brings it back under protection.

Personal work related grievances can be raised with your Manager or People Team Business Partner.

### How do I contact EthicsLine?

Please refer to "EthicsLine" section of the policy.

### Who manages EthicsLine

Please refer to "EthicsLine" section of the policy.

### What happens when I call EthicsLine?

When Deloitte receives disclosure on the hotline, they do the following:

- Seek to obtain all necessary information from the person making the disclosure;
- Take all reasonable steps to protect the anonymity of a person making the disclosure where anonymity is requested;
- Record the details of all disclosures in a secure database;
- Impartially assess all disclosures received; and
- Report the results of all disclosures to the CIC by the close of the following business day.

### What will be asked when I make a disclosure?

The forensic specialist or other eligible recipient will need as much information as possible regarding the matter you wish to report. Please allow at least 10-15 minutes to initially discuss the matter. You will be asked to describe in detail the matter you wish to report, including details of:

- The misconduct or matter reported;
- Those involved in any suspected misconduct or wrongdoing;
- How the matter was discovered;
- The location of the suspected activity;
- The time period that the matter covered;
- The location and type of supporting information and evidence available; and
- Whether there are any other persons with relevant information.

A discloser can refuse to answer any questions that they feel will reveal their identity if they wish to remain anonymous, noting that EthicsLine allows the discloser to reveal their identity to Deloitte without it being passed on to Sunsuper if they wish to do so.

Do I have to identify myself?

Although persons making a disclosure to EthicsLine can remain anonymous, they will be asked if they wish to identify themselves. Identifying the discloser allows the investigator to put in place suitable arrangements to contact the person again if further information or clarification is required. However, persons who request anonymity will be provided with a unique reference number and will be encouraged to make further contact (within an agreed timeframe) so that they have the opportunity to provide any further information and may be kept informed of how their disclosure is being progressed.

If a discloser remains anonymous and does not make further contact this could place limitations on Sunsuper being able to complete the investigation. EthicsLine provides the ability to remain anonymous but maintain two way communication through the online portal. Furthermore EthicsLine provides the ability for a discloser to reveal their identity and/or contact information to Deloitte but request that it is not passed on to Sunsuper. That way Deloitte can maintain communication with a discloser.

How will my identity/disclosure be kept confidential?

We will take all reasonable steps to protect the identity of a person making a disclosure, and will not disclose that person's identity unless authorised by that person, except to the extent required by law. We will take reasonable steps to ensure that all files, whether paper or electronic, are kept secure and can only be accessed by authorised personnel.

The EthicsLine process protects confidentiality by allowing the discloser to remain anonymous. Reports will refer to the discloser in gender neutral context and personal information will be redacted. Investigation information will be stored in the EthicsLine platform which is secure with only members of the CIC and an alternate designated member of the Board able to access.

The EthicsLine hotline service does not have caller identification, calls will not be recorded nor traced and the originating phone number will not be stored. Web based, written and faxed disclosures can be completely anonymous. Email disclosures by nature will make the sending email address known to Deloitte but no other personal information needs to be provided. A person who wishes to make a disclosure can use the contact channel that they are most comfortable with.

Who investigates calls to EthicsLine?

Please refer to "Investigation of disclosures" section of the policy.

How do I know if my disclosure is taken seriously?

To the extent possible, Deloitte, or other recipient, will ensure that the person making a disclosure is kept appropriately informed of the progress of action taken in respect of the disclosure. The extent to which the person can be informed of specifics will be judged on a case-by-case basis. At the conclusion of the investigation, the person will (in most cases) be informed of the outcome. However, this may only be to the extent of being informed whether the matter has been substantiated, or that the matter has been resolved.

How am I protected if I make a disclosure?

Please refer to "Protection for disclosers" section of the policy.

How are the subjects of a disclosure treated?

A person who is the subject of a disclosure is entitled to fair treatment. In this regard:

- The confidentiality of the identity of any person who is the subject of a disclosure will be protected and maintained, to the extent possible and as permissible by law;
- All disclosures will be assessed and acted on impartially, fairly and reasonably;
- Disclosures will be investigated as discreetly as possible; and

- Officers who receive a disclosure in accordance with this policy will act fairly towards any person who is the subject of a disclosure.

A person who is the subject of a disclosure which is investigated has the right to be:

- Informed as to the substance of any adverse comment that may be included in a report or the likelihood of it arising out of any such investigation. However, they will not be entitled to a copy of any report; and
- Given a reasonable opportunity to put their case to the investigator(s) before any final decision, determination, report or the like is made.

Where the allegations contained in a disclosure are clearly wrong or unsubstantiated, a person who is the subject of the disclosure is entitled to continue in their role as if no allegation was made.

In some cases, where the fact of the investigation is widely known, this may involve a statement of exoneration.

Am I at risk of retaliation or detrimental action if I am interviewed or information is collected from me in the course of an investigation which supports a finding of improper conduct or otherwise implicates others?

Persons providing information as requested during an investigation will be protected from detrimental action in the same way as an initial discloser is. That is, a person providing information with reasonable grounds to suspect that it concerns reportable conduct will be protected from detrimental action in retaliation for their provision of information.

What if I am implicated in a disclosure or my conduct is called into question in an investigation and I believe wrongfully so?

It is important to support the investigation of matters by providing information as requested. Investigation is a necessary step in learning the relevant facts and information to reach the best and most appropriate outcome. All persons interviewed or otherwise involved in the investigation will be treated fairly and will have an opportunity to present relevant information. If persons become distressed or need support, they should take advantage of the EAP and/or speak to the Committee about getting support.

Sometimes, people who become distressed or annoyed during an investigation are tempted to speculate about the identity of an anonymous person making a disclosure, and may seek to identify the discloser (to confront them, or for retaliation, or some other reason). It is important that all persons respect the anonymity of the discloser and not seek to identify them. This best supports and promotes good governance, open communication and transparency, and it is also required by our policy. It must also be remembered that any form of retaliation or detrimental action against a person for making a disclosure is prohibited and will be considered serious misconduct.

Do I need to disclose a reportable matter if I become aware of it?

It is the responsibility of every person associated with Sunsuper who reasonably suspects any possible misconduct or improper state of affairs, including fraudulent, unethical, illegal or corrupt conduct, as well as violations of the Code of Conduct or related policies, to report their suspicions.

What if I deliberately make a false disclosure?

Where it is shown that a person has deliberately made a false disclosure, that conduct itself will be considered a serious matter and render the person concerned subject to disciplinary action.

A disclosure by a person with information that supports the person had reasonable grounds to suspect misconduct, an improper state of affairs, or other reportable matters will be a protected disclosure, even if it turns out that the reported matters did not constitute misconduct or an improper state of affairs.

What if I disclose wrongful conduct which I have been involved in?

Please refer to 'Protection for disclosers' section of the policy.

Can I make a disclosure to an external party such as a regulator?

You can make a disclosures to ASIC, APRA or ATO through the following channels:

- ASIC - You can lodge a report with ASIC through their [online misconduct reporting form](https://asic.gov.au/about-asic/contact-us/how-to-complain/report-misconduct-to-asic/) (<https://asic.gov.au/about-asic/contact-us/how-to-complain/report-misconduct-to-asic/>) or by [writing to ASIC](https://asic.gov.au/about-asic/contact-us/#write-to-us) (<https://asic.gov.au/about-asic/contact-us/#write-to-us>);
- APRA - If you would like to share information directly with APRA, you should contact an authorised officer by email: [whistleblower@apra.gov.au](mailto:whistleblower@apra.gov.au);
- APRA Public Interest Disclosure - If you would like to make a public interest disclosure directly to APRA, you should contact an authorised officer by email: [PID@apra.gov.au](mailto:PID@apra.gov.au) or post your disclosure marked 'Confidential' to:
  - Chief Risk Officer
  - APRA
  - GPO Box 9836
  - Sydney NSW 2001; and
- ATO - You can lodge a report via phone, online or in writing. Please refer to the following for more information: <https://www.ato.gov.au/general/gen/whistleblowers/>.

What if I have questions about EthicsLine or whistleblower matters?

If you have questions about EthicsLine or whistleblower matters you may contact any of the following:

- The Chair of the Audit, Compliance and Risk Management Committee;
- Debbie Robinson, General Counsel;
- Lachlan East, Chief Risk Officer; and
- Deloitte.