

Whistleblowing Policy

Approver	AMP Limited Board Audit Committee
Owner	Chief Executive Officer
Manager	Group General Counsel
Target Audience	All staff and all other persons eligible to make a disclosure under this Policy
Effective Date	23/05/2024
Next Review Date	22/05/2026
Contact	whistleblowing@amp.com.au

1. Speaking up at AMP

AMP is committed to conducting its business honestly, with integrity, and in accordance with its Purpose and Values and the standards of expected behaviour as detailed in our Code of Conduct.

As set out in our Code of Conduct, AMP encourages our officers, staff and external partners to speak up and raise concerns about incidents, practices or conduct occurring at AMP. Anyone seeking to raise a concern can speak with a leader at AMP or can raise the matter through one of the other channels available:

P&C Business unit contact	<p>Full contact details for each channel are contained on the Hub – click here to find out more.</p> <p>← If you are not on the AMP network, you can find contact details by simply clicking on the channel you want.</p>
PeopleHELPDESK	
Whistleblowing Program	
Health, Safety & Wellbeing Team	
Workplace Relations Team	
Financial Crime Team (including anti-money laundering)	
Fraud Team	

You have a choice about where you go and with whom you speak, and you may remain anonymous. You should report concerns through the channel that feels right for you.

AMP will listen and take action, and everyone involved will be treated fairly and respectfully, with safety and wellbeing prioritised and supported.

This Policy deals specifically with concerns raised that qualify as whistleblowing under relevant laws and so attract the protections that those laws provide. It sets out who can make a whistleblowing disclosure, how to raise it, what protections apply to whistleblowers, and the processes at AMP for responding to whistleblowing disclosures.

AMP considers this Policy to be an important tool for helping identify wrongdoing at AMP that may not be uncovered unless there is a safe and secure means for disclosing wrongdoing.

AMP will not tolerate a whistleblower being subject to any detriment because they want to raise a concern or have done so. Disciplinary action, up to and including termination of employment or engagement, may be imposed on anyone found to have caused detriment to a whistleblower because they want to, or have, raised a concern.

2. When will this policy apply?

This policy will apply when an individual makes an eligible disclosure in relation to AMP Limited or any of its subsidiaries (“AMP”).

An eligible disclosure occurs when:

- an *eligible whistleblower*
- makes a disclosure of information that the eligible whistleblower has reasonable grounds to suspect relates to a *disclosable matter* in relation to AMP
- to an *eligible recipient*.

“Reasonable grounds to suspect” is based on the objective reasonableness of the reasons for the eligible whistleblower’s suspicion. It ensures that an eligible whistleblower’s motive for making a disclosure, or their personal opinion of those involved, does not prevent them from qualifying for protection. While a mere allegation with no supporting information is unlikely to qualify, an eligible whistleblower does not need to prove their allegations.

An eligible whistleblower can still qualify for protection if their disclosure turns out to be incorrect. However, you should not make a disclosure that you know is false or misleading and doing so may have serious consequences.

Application outside Australia

AMP operates in multiple countries and is subject to, and applied in accordance with, applicable local laws. While this Policy applies across all countries in which AMP operates, it has been primarily drafted to reflect whistleblowing laws and regulatory requirements that apply in Australia. These are, principally, the *Corporations Act 2001* (Cth) and (for tax-related misconduct) the *Taxation Administration Act 1953* (Cth).

If any local laws are inconsistent with this policy or impose a higher level of protection than this Policy, those local laws take precedence to the extent of the inconsistency. In addition, the statutory protections afforded to whistleblowers in countries outside Australia will generally only apply if the specific requirements of the local laws are complied with.

The Appendix to this Policy sets out the key elements of the whistleblowing laws that apply in New Zealand.

3. Who is an eligible whistleblower?

An eligible whistleblower includes current and former:

- employees
- officers
- individuals who supply services or goods to AMP (whether paid or unpaid)
- employees of an individual or organisation that supplies services or goods to AMP (whether paid or unpaid)
- employees or officers of a trustee of an AMP superannuation entity (Trustee) or of a custodian or investment manager of a Trustee, individuals who supply services or goods to a Trustee or a custodian or investment manager of a Trustee (whether paid or unpaid), and employees of a person who supplies services or goods to a Trustee or a custodian or investment manager of a Trustee (whether paid or unpaid)
- individuals who are an associate of AMP (for example, an individual who is acting in concert with AMP), and
- certain relatives and dependants of any of the individuals listed above (or a dependant of their spouse).

4. What is (and is not) a disclosable matter?

The types of matters that qualify for protection under Australian whistleblowing laws as disclosable matters involve information that concerns:

- misconduct, or an improper state of affairs or circumstances, in relation to AMP or its tax affairs
- conduct engaged in by AMP or any of its employees or officers that constitutes an offence against, or a contravention of, a provision of any of the following:
 - i. the *Corporations Act 2001*
 - ii. the *Australian Securities and Investments Commission Act 2001*
 - iii. the *Banking Act 1959*
 - iv. the *Financial Sector (Collection of Data) Act 2001*
 - v. the *Insurance Act 1973*
 - vi. the *Life Insurance Act 1995*
 - vii. the *National Consumer Credit Protection Act 2009*
 - viii. the *Superannuation Industry (Supervision) Act 1993*
 - ix. an instrument made under an Act referred to in any of subparagraphs i to viii
- conduct engaged in by AMP or any of its employees or officers that constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more, or

- conduct engaged in by AMP or any of its employees or officers that represents a danger to the public or the financial system.

Disclosures that are not about disclosable matters do not qualify for protection under whistleblowing laws. However, they may be protected under other legislation, such as the *Fair Work Act 2009* (Cth).

Examples of disclosable matters

While misconduct and an improper state or affairs or circumstances are not exhaustively defined under whistleblowing laws, examples include:

- fraud, misappropriation of funds or theft (for example, falsifying loan or credit applications)
- dishonest or corrupt behaviour (for example, accepting or offering a bribe, dishonestly taking advantage of an employment position or office held)
- illegal activities (for example, insider trading, market manipulation, money laundering, knowingly making false statements, misreporting financial information, violence, selling or using illicit drugs)
- serious misconduct in relation to accounting, taxation, internal controls, compliance, internal audit or external audit laws, policies or practices
- serious or systemic breaches of AMP's Code of Conduct or policies (for example, engaging in or facilitating modern slavery or failing to disclose conflicts of interest)
- negligence, breach of trust or breach of duty
- systemic issues concerning AMP that may cause customer harm
- concerns that pose a risk to public safety or the stability of, or confidence in, the financial system, and
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure.

Disclosable matters can include conduct that may not involve a contravention of a particular law.

You can also make a protected disclosure to a lawyer where you seek legal advice or legal representation in relation to the operation of the whistleblower laws, even if the lawyer ultimately concludes that the disclosure does not relate to a disclosable matter.

Personal work-related grievances

Disclosures that involve personal work-related grievances are generally not covered by whistleblowing laws or this Policy. They should instead be raised in accordance with the Complaints Handling Policy for Workers to allow those issues to be resolved most effectively.

What are personal work-related grievances?

These are concerns or complaints relating to a person's current or former employment having (or tending to have) implications for them personally and which do not fall within the scope of a disclosable matter that qualifies for whistleblowing protection.

Examples of personal work-related grievances include:

- an interpersonal conflict between the person and another employee
- a decision relating to their employment or the terms and conditions of their employment, such as appointment, transfer, promotion or remuneration, and
- a decision relating to disciplinary action, such as suspension or termination.

However, a personal work-related grievance that is raised may still qualify for whistleblowing protection and be covered under this Policy if it:

- also has significant implications for AMP that do not relate to the discloser
- includes information about a disclosable matter under this Policy beyond the discloser's personal circumstances

- concerns conduct or alleged conduct that is a contravention of certain financial services laws, or that breaches certain other laws punishable by imprisonment for 12 months or more, or that represents a danger to the public or the financial system, or
- relates to detriment they have suffered or have been threatened with because they have raised (or propose to raise) a concern about a disclosable matter.

5. How can I make a whistleblowing disclosure? Who is an eligible recipient?

To be afforded whistleblower protection under Australian whistleblowing laws, you must disclose your concerns about disclosable matters to an eligible recipient. The role of an eligible recipient is to receive disclosures that may qualify for protection.

You are encouraged to report matters even if you are unsure whether it is or is not a matter that qualifies for protection. Even if your disclosure does not qualify for protection under whistleblowing laws, AMP will still treat your disclosure in confidence.

Eligible recipients at AMP include:

- the Group Whistleblowing Officer (currently, the Group General Counsel), by delegation from the Chief Executive Officer
- the Chief Executive Officer (who has ultimate accountability for AMP’s whistleblowing program and this Policy)
- the Group Executives and those of their direct reports who are at “Director”, “General Manager” or “Head of” level
- a director, officer or senior manager of AMP (each as defined in the Corporations Act)
- AMP’s internal auditors
- AMP’s actuaries
- AMP’s external auditor or any member of their team that conducts audits on AMP
- In relation to tax matters, senior employees who discharge functions or duties that relate to AMP’s tax affairs, or a registered tax agent or BAS agent who provides tax agent or BAS services to AMP, and
- Your Call, an external and independent provider contracted by AMP to receive disclosures impartially and confidentially. Any disclosure you make to Your Call is shared only with the CEO and the Group Whistleblowing Officer and you can choose to remain anonymous. Your Call can be contacted by:

- Phone: 1300 790 228 (Australia), 0800 123 508 (New Zealand) or +61 3 9895 0012 (worldwide), between 9am – 12am Australian Eastern Standard Time, Monday to Friday, excluding national public holidays
- Email to amp@yourcall.com.au
- Online at yourcall.com.au/report using AMP1849 as the organisation ID
- Mail to Locked Mail Bag 7777, Malvern VIC 3144 Australia
- If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service (Australia) or New Zealand Relay. Simply choose your contact method at relayservice.gov.au or nzrelay.co.nz and request Your Call’s hotline 1300 790 228.

You may choose to contact other eligible recipients by telephone, in person, by email or by post.

You can directly access the Group Whistleblowing Program by email to its dedicated and confidential Inbox at whistleblowing@amp.com.au. The Group Whistleblowing Program Inbox is monitored by, and only accessible by, the Group Whistleblowing Officer and an additional delegate nominated by the Group Whistleblowing Officer sourced from either the Legal team in Legal & Governance or the Workplace Relations team in People & Culture.

If you wish to seek additional information about the whistleblowing process or protections, you can contact the Group Whistleblowing Officer.

You can also make whistleblowing disclosures to ASIC or APRA, or (for tax-related matters) to the Commissioner of Taxation.

In limited circumstances, certain "public interest" or "emergency" disclosures to journalists and members of Commonwealth, state or territory parliaments are also protected by law. Certain steps need to be taken before a "public interest" or "emergency" disclosure can be made to one of these people and it is important that you understand these. For example, you must have previously made a disclosure to ASIC, APRA or another prescribed body before you can make a "public interest" or "emergency" disclosure and, in the case of a "public interest" disclosure, at least 90 days must have passed since the previous disclosure. You should consider contacting an independent legal adviser before making a public interest disclosure or an emergency disclosure.

6. What information should be provided when making a whistleblowing disclosure? How will confidentiality be protected?

To assist AMP to address a concern regarding a disclosable matter, you should provide as much information as possible, including where relevant:

- that your concern is being raised pursuant to this Policy
- the nature of the disclosable matter and when and where it occurred or is likely to occur
- the names of people believed to be involved in the disclosable matter
- any material to support the matters raised in your concern, such as documents, emails or messages, and
- any steps you have taken to report the matter elsewhere.

AMP's priority is to support and protect whistleblowers who raise concerns about disclosable matters in accordance with this Policy. If you raise a concern regarding a disclosable matter, your identity (and any information that AMP has because of your report that someone could likely use to identify you) will only be disclosed if:

- you give your consent for the disclosure of that information
- the disclosure is allowed or required by law (for example, disclosure to a lawyer to obtain legal advice, or disclosure to ASIC, APRA, the Australian Federal Police or, in relation to tax matters, the Commissioner of Taxation), or
- in the case of information likely to lead to your identification, it is reasonably necessary to disclose for the purposes of an investigation, but your identity itself will not be disclosed and all reasonable steps will be taken by AMP to reduce the risk that you will be identified.

If you do not consent to the limited sharing within AMP of your identity and the information provided by you as needed to assess and investigate your report, this may limit AMP's ability to progress your report and to take any action in relation to it.

It is illegal for a person to identify a whistleblower, or disclose information that is likely to lead to the identification of the whistleblower, without consent outside the exceptions above. If you believe your confidentiality has been breached, you should raise this with the Group Whistleblowing Officer or the Whistleblowing Protection Officer.

To preserve confidentiality, AMP takes a number of steps, including limiting access to your disclosure and any information generated as a result of your disclosure and carefully reviewing and potentially de-identifying certain aspects of your disclosure.

7. Can disclosures be made anonymously?

You can make an anonymous disclosure if you do not want to reveal your identity by using Your Call and you will still be protected by the whistleblowing provisions under Australian law and this Policy. Your Call's online system then allows you to exchange messages with the Group Whistleblowing Program while remaining anonymous, which is important so AMP can ask follow-up questions and keep you informed. Alternatively, you may wish to adopt a pseudonym for the purpose of your disclosure.

You can remain anonymous for the duration of the investigation and after the investigation has finalised. You can refuse to answer questions that you feel might reveal your identity at any time, including during follow up conversations.

If you do not provide your identity, AMP will assess the content of your report in the same way as if you had revealed your identity, and any investigation will be conducted to the extent possible in the circumstances. However, an investigation may not always be possible or may be less efficient and effective unless sufficient information is provided. It may also be difficult to offer you the same level of practical support and protection if AMP does not know your identity.

8. How will AMP respond?

All reports of disclosable matters are referred to the Group Whistleblowing Program (provided consent has been obtained from the whistleblower, where needed) to ensure they are managed in accordance with this Policy, unless doing so will raise a conflict. Reports will be received and treated sensitively and seriously, and dealt with promptly and objectively.

Initial assessment

All disclosures will be assessed and considered, and a decision will be made as to whether they qualify for protection as a protected disclosure under this Policy and, if so, whether a formal investigation is required. If your disclosure is assessed not to qualify as a protected disclosure under this Policy, you will be advised of this and, subject to your consent where needed, it may be referred to other areas of AMP for review, for example Workplace Relations team in People & Culture or the Business Unit the subject of the disclosure (or the People Partner for that Business Unit). This may occur, for example, where it is assessed to be a personal work-related grievance, where it does not otherwise satisfy the requirements for a protected disclosure or where it relates to a matter that has been previously disclosed and investigated with no new material information arising.

AMP's response to a disclosure covered by this Policy will vary depending on the nature of the disclosure (including the amount of information provided).

You may be told how AMP has decided to respond to a concern raised, including if a formal investigation will be conducted. However, it may not be possible unless your contact details are provided.

Investigations

Any investigation will be conducted by a member of the Group Whistleblowing Program or, with the discloser's consent (where necessary), an appropriate specialist within or outside AMP. If the investigation is delegated outside of the Whistleblowing Program to a specialist within AMP, the investigator will be from a different business unit from which allegations have been made, from you, and from any person who is the subject of the disclosable matters. Depending on the nature and circumstance of the disclosure, the investigation may be a formal, in-depth investigation or a less formal process. The findings from the investigation will be provided to the relevant decision maker.

Unless there are confidentiality or other reasons not to do so, persons to whom a disclosure relates will be informed of the allegation at the appropriate time and given an opportunity to respond to the allegations made against them as and when required by principles of procedural fairness. They and any witnesses interviewed will only be provided with your identity with your consent. Where possible and appropriate, you will be kept informed of the investigation progress on a regular basis. The frequency and timeframe may vary depending on the nature of the disclosable matters. AMP endeavours to complete investigations within 90 days of receipt of the disclosure, however, acknowledges that this may be exceeded depending on the circumstances of the matter, including the number of witnesses.

Outcomes and findings

The objective of an investigation is to determine whether there is enough evidence to substantiate or refute any or all of the matters reported. Findings will be made on the balance of probabilities.

AMP will, where possible and appropriate, communicate the high-level findings of any investigation arising from a concern regarding disclosable matters to you, however full details of the findings and outcomes are unlikely to be available for reasons relating to confidentiality, privacy and the legal rights of those concerned.

Any report prepared in relation to an investigation remains the property of AMP and will not be provided to a whistleblower or any other person to whom a concern relates. Where an investigation identifies misconduct or other inappropriate conduct, appropriate disciplinary action may be taken in AMP's discretion. This may include, but is not limited to, terminating or suspending the employment or engagement of any person involved in the conduct.

If an investigation finds that criminal activity has or is likely to have occurred, the matter may be reported to law enforcement agencies and other regulatory authorities.

Roles and responsibilities

All AMP staff, directors and officers must co-operate fully with any investigation that is undertaken.

All whistleblowers who raise a concern under this Policy will have access to the assistance of the Whistleblowing Protection Officer. If you consider that you have been subject to any detriment as a result of raising a concern, you should escalate this to the Group Whistleblowing Officer or Whistleblowing Protection Officer who will decide the appropriate course for handling the matter.

If you consider that the Whistleblowing Protection Officer has not adequately resolved a concern regarding detrimental conduct, you can escalate your complaint to the Chair of the AMP Limited Board Audit Committee.

9. What protections and support exist for whistleblowers?

AMP is committed to protecting whistleblowers from any detriment arising from raising a concern in relation to a disclosable matter. These protections are an essential element of creating an environment in which whistleblowers feel safe to raise disclosable matters. In most cases, these protections are also conferred by law under applicable whistleblowing legislation.

Protection from detriment

No person may cause detriment to someone else (or threaten to do so) because of (or for reasons including) a belief or suspicion that person has made, may make, proposes to make or could make a protected disclosure in relation to a disclosable matter. For this purpose, causing detriment to someone else may include:

- termination of employment
- harassment, bullying or intimidation
- inflicting personal or financial disadvantage
- unlawful discrimination
- causing harm or injury, including psychological harm
- causing damage to reputation, or
- any other conduct that constitutes retaliation.

Any person who engages in detrimental conduct against a person because they have raised or intend to raise a concern regarding disclosable matters may be subject to disciplinary action where it is possible for AMP to take action (including, but not limited to, termination of employment or engagement). In some circumstances, this conduct is a breach of law and may also attract civil and criminal penalties.

You should tell the Group Whistleblowing Officer or the Whistleblowing Protection Officer if you or someone else is being, or has been subject to, detrimental conduct.

Despite any protected disclosure they may make, AMP remains able to raise and address with a whistleblower any matters that arise in the ordinary course of their employment or contractual relationship with AMP (for example, any separate performance or misconduct concerns) or to take appropriate action to seek to prevent detriment against another whistleblower.

You may also be able to seek compensation and other remedies through the courts if:

- you have suffered loss, damage or injury because of an actual or proposed disclosure, and
- AMP has failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

You should seek independent legal advice in relation to these rights.

Civil, criminal and administrative liability protection

A whistleblower is also protected from civil liability, criminal liability and administrative liability in relation to their disclosure, and information they disclose cannot be used in legal proceedings against them (except for proceedings in relation to giving false information). However, this protection does not give you immunity for any misconduct you may have engaged in that is revealed in your disclosure.

Other protections and support available

AMP is committed to making sure that whistleblowers do not suffer detriment because they raise a concern. The protections offered will be determined by AMP and depend on factors including the nature of the disclosable matter and the people involved. In protecting you from detriment, AMP may undertake one or more of the following:

- risk assessments undertaken to determine the risk of detriment against a whistleblower
- monitoring and managing the behaviour of other employees
- providing access to support services, which may include (depending on the circumstances) expert wellbeing support within AMP, AMP's Employee Assistance Program or alternate providers
- providing accessible training for management to understand their responsibilities to maintain confidentiality of a disclosure

- relocating individuals (which may include the people alleged to have been involved in the disclosable matters) to a different division, team or office, and
- offering an individual a leave of absence or flexible working arrangements while a matter is being investigated.

AMP will look for ways to support all whistleblowers who raise a concern, but it may not be able to provide non-employees with the same type and level of support that it provides to its employees. AMP will however still seek to offer as much support as reasonably practicable. The Whistleblowing Protection Officer will assist in supporting your wellbeing.

10. What protections and support exist for persons who are the subject of, or mentioned in, whistleblowing disclosures?

If you are an employee or officer who is the subject of or mentioned in a whistleblowing disclosure, AMP recognises the importance of ensuring you are treated fairly and will seek to ensure this by:

- handling information in accordance with this Policy
- undertaking an impartial investigation
- providing you with an opportunity to respond to any allegations before any findings are concluded and considering any information you provide
- notifying you of the outcomes at a high level, and
- providing you with access to AMP's wellbeing and employee support services.

The above measures are intended to be general principles and will be subject to any limitations by law, the circumstances of any particular disclosure and the confidentiality constraints of this Policy.

11. Escalations relating to the Whistleblowing Program

A whistleblower may escalate their concerns directly to Chair of the AMP Limited Board Audit Committee if:

- they are not satisfied with a decision not to conduct an investigation into their concern or the findings of any investigation
- they consider that the Group Whistleblowing Officer or Whistleblowing Protection Officer has not adequately resolved a complaint regarding detrimental conduct, or
- they consider that this Policy has not been followed by AMP.

A whistleblower may escalate their concern by providing a written submission to the Chair of the AMP Limited Board Audit Committee outlining their reasons for review. This is to be submitted to the Whistleblowing Protection Officer who is obliged to escalate the concerns, unless it concerns the Whistleblowing Protection Officer in which case it should be submitted directly to the Chair of the AMP Limited Board Audit Committee.

When considering an escalation, the Chair of the AMP Limited Board Audit Committee is not required to reopen or reinvestigate the matter. To arrive at a decision, the Chair of the AMP Limited Board Audit Committee may review any submission by the whistleblower, the basis of the decision giving rise to the request, and any other information the Chair of the AMP Limited Board Audit Committee considers relevant. The Chair of the AMP Limited Board Audit Committee may make a final determination following the consideration of this material.

12. Reporting

The AMP Limited and AMP Bank Limited Audit Committees will receive summary information in relation to concerns raised under this Policy on a quarterly basis, including metrics on disclosures made. This may include, for example, a summary of the number, nature and outcome of matters that have been raised under this policy. The Committees will also be provided with additional (deidentified) information about themes from any material incidents raised. The Audit Committee of the NM Superannuation Proprietary Limited Board will receive similar information in relation to disclosures that relate to NM Super and AMP's superannuation business in Australia.

13. Availability of this Policy and training

AMP employees and officers will have access to a copy of this Policy on the intranet and will undergo periodic training about the Policy and their rights and obligations under it. Senior AMP executives and directors, including those likely to receive disclosures and those involved in the Group Whistleblowing Program, will also receive training on how to respond to protected disclosures. A copy of this Policy will also be available on AMP's public website.

14. Monitoring and oversight

The Owner of this Policy monitors and oversees compliance with the Policy.

The Audit Committees of AMP Limited, AMP Bank Limited and NM Superannuation Proprietary Limited each have a role in monitoring and overseeing the operation of this Policy.

15. Roles and responsibilities

The roles and responsibilities relating to this Policy are set out in the table below.

Where an individual holding a role under the Policy is unable to fulfill that role for a particular disclosure due to other commitments or an absence, or due to an actual, potential or perceived conflict, the Group Whistleblowing Officer (or failing them, the Chief Executive Officer) may appoint another individual to discharge that role for the disclosure.

Role	Responsibility
AMP Bank Limited Audit Committee/Audit Committee Chair	<ul style="list-style-type: none"> • Approves the Whistleblowing Policy and material changes • Receives (deidentified) periodic reports of Whistleblowing Program metrics and key themes raised by protected disclosures as relevant to AMP Bank
AMP Chief Executive Officer	<ul style="list-style-type: none"> • Has overall executive accountability for the Whistleblowing Program • Champions the Whistleblowing Program and oversees the implementation and effectiveness of the program • Appoints, and delegates operational responsibility for the Group Whistleblowing Program, to the Group Whistleblowing Officer • Receives regular reporting (deidentified where necessary) on disclosures received, the status of investigations, and outcomes and findings
AMP Limited Audit Committee / Audit Committee Chair	<ul style="list-style-type: none"> • Approves the Whistleblowing Policy and material changes • Oversees the effectiveness of the Whistleblowing Program • Manages escalated complaints raised in accordance with this Policy on an AMP Group basis • Receives (deidentified) reports of protected disclosures made and periodic reports of Whistleblowing Program statistics and themes raised by protected disclosures
Group Whistleblowing Officer (Group General Counsel)	<ul style="list-style-type: none"> • Operational responsibility for the Group's Whistleblowing Program by delegation from the Chief Executive Officer • Receives and assesses reports from Whistleblowing channels • Appoints and oversees appropriate internal or external investigators, as appropriate • Provides quarterly reporting on whistleblowing to relevant Committees and Boards

Role	Responsibility
	<ul style="list-style-type: none"> Accountable for notifying the AMP Limited Audit Committee Chair of (deidentified) protected disclosures Accountable for referring potential breaches and misconduct matters for management action in accordance with AMP policies Approves non-material updates to this Policy, in consultation with the Chief Executive Officer
NM Superannuation Proprietary Limited Board and Audit Committee	<ul style="list-style-type: none"> Approves the Whistleblowing Policy and material changes (Board) Receives (deidentified) periodic reports of Whistleblowing Program metrics and key themes raised by protected disclosures as relevant to NM Super and the superannuation business in Australia (Audit Committee)
Whistleblowing Protection Officer (Director, Talent and Business Partnering)	<ul style="list-style-type: none"> Responsible for protecting whistleblowers from detriment as result of making a protected disclosure Supports wellbeing of whistleblowers as a result of making a disclosure Authorised to provide certain protections where they deem appropriate for fulfilling their role Refers escalations to the Chair of the AMP Limited Audit Committee

16. Related documents

Document	Relationship
Code of Conduct	The overarching code describing the required behavioural standards for employees, directors and anyone else who works for AMP
Complaints Handling Policy for Workers	Sets out AMP's approach to the management of workers' complaints and grievances
Consequence Management Policy	Sets out AMP's approach for managing poor conduct
Internal Privacy Policy	Sets out the how personal information will be collected, used, disclosed and handled by AMP

17. Superseded version

Document Name	Effective Date of superseded document
Whistleblowing Policy	February 2022

18. Appendix: Protections for whistleblowers provided by New Zealand Law

In New Zealand, whistleblower protections are governed by the *Protected Disclosures (Protection of Whistleblowers) Act 2022* (Protected Disclosures Act).

While most of this Policy will continue to apply to New Zealand staff, particularly when it comes to the roles and responsibilities set out, this Appendix sets out the different legal obligations and protections that New Zealand employees should be aware of, under the Protected Disclosures Act.

When will this Policy apply?

The protections afforded by this Policy will only apply in New Zealand if the disclosure is not made in bad faith. For example, a person who knowingly makes a false report will not be protected by the law, even if they would otherwise meet all the necessary requirements for protection.

Who is an eligible whistleblower?

The people legally protected under New Zealand law are current or former:

- employees, homeworkers, contractors or volunteers of AMP, and
- individuals concerned in AMP's management (for example, Board members).

What is a disclosable matter?

In New Zealand, a disclosable matter refers to a situation where the eligible whistleblower believes on reasonable grounds that there is, or has been, "serious wrongdoing" in or by AMP. This means an act, omission (ie not taking an act) or course of conduct that is:

- an offence
- a serious risk to the health and safety of an individual or the public
- a serious risk to the environment, or
- a serious risk to the maintenance of law, including the investigation of offences or the right to a fair trial.

How can I make a whistleblowing disclosure? Who is an eligible recipient?

Eligible whistleblowers can disclose to any eligible recipient set out in this Policy.

An eligible whistleblower will also receive protection in New Zealand if the protected disclosure is made to the head or deputy head of AMP, or an "appropriate authority". An appropriate authority includes the head of a public sector organisation, an officer of Parliament or any professional body that can discipline its members (for example, the Financial Advisers Disciplinary Committee).

The Protected Disclosures Act also sets out a list of appropriate authorities depending on the nature of the disclosable matter.

A whistleblower may still be entitled to protection if the disclosure is made to another person, but only if this is done on a confidential basis for the purpose of seeking advice about making a protected disclosure.

How will confidentiality be protected?

The identifying information of New Zealand whistleblowers will only be disclosed in two situations.

The first situation is where the whistleblower gives consent.

The second situation is where AMP has reasonable grounds to believe that the release of the identifying information is essential to:

- investigate the serious wrongdoing (including for law enforcement purposes)
- prevent a serious risk to health and safety or the environment, or
- comply with the principles of natural justice.

Before releasing identifying information, AMP will consult with the whistleblower. The whistleblower will also be informed after their information is released.

How will AMP respond?

AMP will generally respond in the ways set out in this Policy. In summary, AMP will, to the extent possible:

- **acknowledge** the disclosure (including summarising the eligible recipient's understanding where a disclosure was made orally)
- **consider** the disclosure and whether it warrants investigation
- **check** with the discloser whether the disclosure has been made elsewhere (and any associated outcome)
- **deal** with the matter, and
- **inform** the discloser about what has been or is being done to deal with the matter.

To deal with the disclosure, AMP may choose to investigate, act or recommend action to address the serious wrongdoing, refer the disclosure to an appropriate authority or decide that no action is required. AMP may decide no action is required if the disclosure is not protected under the law, if the serious wrongdoing occurred so long ago that an investigation is impracticable or undesirable, or if other means would better address the matter.

In New Zealand, AMP will endeavour to complete these steps within 20 working days. Where that is not possible, AMP will inform the whistleblower of the anticipated timeline and keep them updated about progress.

What protections exist for whistleblowers?

In addition to the protections listed in this Policy, New Zealand law forbids any person from:

- requiring or otherwise causing the whistleblower to resign or retire from employment
- refusing to offer the whistleblower any terms of employment that are offered to other employees with similar qualifications, experience, skills and circumstances. This includes conditions of work, fringe benefits or opportunities for training, promotion and transfer
- disadvantaging the whistleblower in their employment, in situations where other employees would not be subjected to that disadvantage, or
- treating (or threatening to treat) the whistleblower, or a relative or associate of the whistleblower, less favourably than any other comparable person.

The protection from civil, criminal and administrative liability also applies to the eligible recipient under New Zealand law, not just the eligible whistleblower.

Escalations relating to the whistleblowing process or outcome

In addition to the process set out in this Policy, if an eligible whistleblower believes that AMP has not acted in accordance with the Protected Disclosures Act, including not dealing with the matter to address the serious wrongdoing, New Zealand law grants them a right to make a further disclosure to a Minister.