



WHISTLEBLOWING POLICY

Overview: Use this policy if you want to know more about our Whistleblowing Process

Scope: Acting ethically and with integrity is core to what Telstra stands for. This policy is designed to support you to find your courage and take action if you have concerns about illegal, unethical or improper conduct. This policy should be read with the Whistleblowing Investigation Process.

This policy also provides you with support and protections available to you in making a disclosure. Telstra has an Ethical Behaviour Framework and this policy supports that framework.

Who does this policy apply to?

01. You can use this policy to report your concerns about illegal, unethical or improper conduct, including misconduct, or an improper state of affairs or circumstances relating to Telstra and its related bodies corporate (collectively "Telstra Group").
02. By law, certain protections may also apply to current and former Telstra Group employees, contractors, individual suppliers (and their employees), directors, officers and associates, and certain relatives and dependants of these individuals, who make disclosures in the manner set out in this policy. These protections are set out in further detail below.
03. This is a policy of the Telstra Group and any other entity notified that this policy applies to it. It applies to all Telstra Group directors, officers, employees and contractors and to any other person notified that this policy applies to them.

What is reportable conduct?

04. You can make a disclosure under this policy if you have reasonable grounds to suspect that you have information concerning illegal, unethical or improper conduct, including misconduct, or an improper state of affairs or circumstances within the Telstra Group, or by someone connected with Telstra (**Reportable Conduct**).
05. Under this policy, Reportable Conduct includes conduct that:
 - a) Is illegal, unethical or improper such as:
 - i. Taking bribes in return for business favours or commercial advantage;
 - ii. Unauthorised distribution or sale of customers' personal information;
 - iii. Price fixing and financial misreporting;
 - iv. Improper use of email or internet services; or
 - v. Collusion, theft and fraud;
 - b) Is a serious breach of any internal Telstra Group policy, including the Code of Conduct; or
 - c) Represents a danger to the public or the financial system.
06. Reportable Conduct does not include personal work-related grievances, unless the complaint is about your victimisation as a whistleblower. Examples of personal work-related grievances include disclosures regarding interpersonal conflicts with other employees, transfer and promotion decisions, decisions regarding the terms and conditions of employment, decisions regarding suspension and termination of employment and disciplinary decisions. These issues can be raised via the HR team.



How do I make a disclosure under this policy?

07. The Telstra Group has several channels available if you have or become aware of Reportable Conduct. You can make a disclosure anonymously if you would like to. When making a disclosure to the Whistleblowing Service, Whistleblower Protection Officer or a Telstra Group officer, director or group executive we encourage you to refer to this Policy or request protections under this policy.

Whistleblowing Service

08. The Telstra Group has established an independent Whistleblowing Service. The Whistleblowing Service is provided by an independent third-party service provider that specialises in handling sensitive reports and disclosures. The Whistleblowing Service is available 24 hours a day, 7 days a week, all year round. Reports and disclosures to the Whistleblowing Service can be made in multiple languages, with translation and interpretation services available.
09. For the purposes of this policy to ensure appropriate escalation and timely investigation, we request that reports are made through the Whistleblowing Service. Any queries about how this Whistleblowing Policy operates should also be submitted through the Whistleblowing Service.
10. Reportable Conduct can be disclosed to the Telstra Group's Whistleblowing Service via phone or online:

Webform: [Telstra's Whistleblowing Service](#)

Phone: [Download Global Contact Phone Numbers](#)

Whistleblowing Service staff are experienced in handling sensitive reports from employees. All disclosures are treated as confidential. If a disclosure is made anonymously, the Whistleblowing Service has a code system that allows anonymous disclosers to check on the progress of an investigation, or to provide further information if necessary.

Telstra Group Whistleblowing Committee

11. Reportable Conduct can also be disclosed to certain core members of Telstra Group's Whistleblowing Committee ("Whistleblowing Committee"). Further details of the Whistleblowing Committee, and which Whistleblowing Committee members can receive disclosures under this Policy, can be found [here](#).

Designated Whistleblower Protection Officer

12. Reportable Conduct can also be disclosed to the Whistleblower Protection Officer, who is company secretary of Telstra and chair of the Whistleblowing Committee. The Whistleblowing Protection Officer can be contacted at companysecretary@telstra.com.au.

Telstra Group Officers, Directors and Group Executives

13. Reportable Conduct can also be disclosed to any Telstra Group Directors¹, officer² or Group Executive.³

Disclosures to others

14. By law, you may also receive certain protections if you make disclosures to:

¹ This means Telstra Corporation Limited board members and directors of other Telstra Group entities.

² Officer is defined in the Corporations Act 2001 (Cth) and in Telstra's organisational structure this means a Group Executive or Company Secretary of any member of the Telstra Group.

³ Telstra considers that Group Executives includes senior managers as defined in the *Corporations Act 2001* (Cth) being "any person in the company who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the company, or who has the capacity to significantly affect the company's financial standing."



- a) Telstra Group's auditor (or a member of that firm's audit team);
- b) a Telstra Group Director, officer or employee who has functions or duties relating to the entity's tax affairs and who you consider may be assisted in their role by knowing that information (such as a member of Telstra's tax team), only if the disclosure concerns the tax affairs of the Telstra Group or an associate of the Telstra Group;
- c) the registered tax agent or BAS agent of an entity within the Telstra Group, only if the disclosure concerns the tax affairs of the Telstra Group or an associate of the Telstra Group.

Disclosures made by email

- 15. Disclosures made by email may be accessible by people other than those to whom they are addressed. By making your disclosure by email, you consent to your email potentially being accessed by others, including in accordance with our Group Security Policy. For the avoidance of doubt, any Telstra Group employee, officer or contractor who becomes aware of a disclosure must comply with all aspects of this policy, including the confidentiality requirements set out below.

Protections provided to persons making disclosures

- 16. The Telstra Group is committed to supporting and protecting those who disclose Reportable Conduct under this policy.

Protections

- 17. The Telstra Group is committed to ensuring that you are protected from any threatened or actual detriment connected with disclosing Reportable Conduct under this policy. Detriment includes dismissal, demotion, alteration of your duties to your disadvantage, any form of harassment, discrimination, intimidation, harm or injury (including psychological harm, reputational damage, damage to your business or financial position) or any other damage connected with making a disclosure under this policy.
- 18. Telstra Group directors, officers, employees and contractors must not cause or threaten any detriment to a person for a reason which includes that they or any other person:
 - a) has or proposes to make a disclosure protected by this policy or by Australian whistleblower laws; or
 - b) is suspected or believed to have, or could have, made a disclosure protected by this policy or by Australian whistleblower laws.
- 19. However, a person may be held liable for any personal misconduct revealed by their disclosure.
- 20. If you believe you have been subjected to or threatened with detrimental treatment you should contact the Whistleblower Protection Officer who will review the allegation.
- 21. Australian whistleblower laws means the whistleblower regimes set out in the Corporations Act and Taxation Administration Act. Additional protections afforded by these regimes are set out in Annexure A and Annexure B. You can contact a relevant regulator, such as ASIC, if you are concerned that you have not been protected in accordance with Australian whistleblower laws, including if you believe you have been subjected to or threatened with detrimental treatment.

Support

- 22. The Telstra Group recognises that making a disclosure under this policy can be a difficult thing to do. Telstra employees and their families can contact Telstra's employee assistance program for support, which provides professional, confidential coaching and support. Information on how to contact the employee assistance program is available on Telstra's intranet [here](#). You can also contact the designated Whistleblower Protection Officer if you require additional support.



Confidentiality and anonymous disclosures

23. Your identity (or information that could lead to your identification) will be kept strictly confidential throughout the investigation process and must not be shared unless:
 - a) You have provided your consent;
 - b) Telstra considers it appropriate to report your concern to a regulator such as the Australian Securities and Investments Commission (**ASIC**), the Australian Prudential Regulation Authority (**APRA**), the Australian Tax Commissioner or the Australian Federal Police;
 - c) We raise the concern with a lawyer for the purpose of seeking legal advice or representation in relation to the operation of Australian whistleblower laws.
24. In the course of the disclosure being investigated, it may be necessary to reveal its substance (on a confidential basis) to other people involved in the investigation process or, in appropriate circumstances, law enforcement agencies. We may also need to let the person subject to the disclosure know a disclosure has been made about them for the purpose of providing them with an opportunity to respond.
25. During such an investigation, we will not disclose your identity (except as specified above), but we may disclose details that might reveal your identity if it is reasonably necessary for the effective investigation of the matter. If doing so, we will take all reasonable steps to reduce the risk that you will be identified.
26. You may also choose to remain anonymous in making a disclosure under this policy. If you choose to remain anonymous, you may still be asked to provide some details so that the disclosure can be adequately investigated. It may not be possible to investigate the disclosure as thoroughly if it is made without sufficient details.
27. Any Telstra Group employee, officer or contractor must not disclose or produce to a court or tribunal any information or documents which discloses the identity of a whistleblower (or information which is likely to lead to their identity becoming known) without first seeking the advice of the Group General Counsel or their delegate.

Investigation process

28. Disclosures of Reportable Conduct will be investigated in accordance with the Whistleblowing Investigation Process.
29. Once a disclosure is received, an investigator will be assigned to investigate the matter on behalf of the Whistleblowing Committee. The Whistleblowing Committee has oversight of all investigations conducted under this policy. In some circumstances it may not be possible to investigate a disclosure, for example if insufficient information has been provided by the discloser and the discloser has not responded to requests for further information.
30. The investigation must be conducted fairly and objectively and the investigator must follow all applicable Telstra Group policies and procedures, including this policy and the Telstra Code of Conduct. Any person mentioned in a disclosure or to whom a disclosure relates must be afforded procedural fairness prior to any findings being made against them as per standard Telstra policies and processes in relation to our people.
31. When the investigator has finalised the investigation he or she must report on the process, the findings and, where applicable, recommendations for action to the Whistleblowing Committee. The Whistleblowing Committee or Chair of the Whistleblowing Committee will consider the investigation report, findings and recommendations for action.
32. An individual who makes a disclosure under this Policy will not directly be part of the investigation. However, the investigator may seek clarification of details or ask for more information from a discloser.



33. If you are approached as part of an investigation you are required to provide assistance, as requested, in a discreet and timely manner and to maintain confidentiality of the whistleblower's identity (if known) at all times. Everyone involved in a whistleblowing investigation must maintain confidentiality and security and may commit an offence under the Corporations Act if they fail to do so.
34. If you are not satisfied that your report has been investigated and acted upon appropriately, you may contact the Chief Compliance Officer to request a review.

People and operations outside of Australia

35. You can make a report regardless of where you are located around the world, or where the conduct is occurring. If your report concerns conduct, people, or operations located outside of Australia, there may be some specific requirements, depending on which country is involved. Please see the Country Schedules attached to this policy. If there is no separate Country Schedule for a country, the general provisions of this Whistleblowing Policy apply in full.

Training

36. The Telstra Group will provide training for employees and officers about this policy, and for individuals who may receive a disclosure under this policy. Information about this policy will be included in regular compliance training.

Reporting and governance

37. This policy and associated Whistleblowing Investigation Process is managed by the Office of the Company Secretary and the Chief Risk Office, under the oversight of the Whistleblowing Committee. The Chair of the Whistleblowing Committee will provide regular reports to the Audit and Risk Committee on material incidents and on the operation of the Whistleblowing Policy.

Publication

38. This policy is published on Telstra's website and is accessible to all Telstra Group employees, officers and members of the public.

Review

39. This policy is current as at 29 November 2019 and will be periodically reviewed to ensure it is operating effectively, and to make any changes required.

Breach of policy	Application
Compliance with this Policy will be monitored. If you don't comply with this Policy you could face disciplinary action. This may include termination of your employment or engagement. If you break the law you may also be personally liable.	This is a policy of the Telstra Group and any other entity notified that this policy applies to it. It applies to all Telstra Group directors, officers, employees and contractors and to any other person notified that this policy applies to them.



Annexure A – Special protections under the Corporations Act

Note: This Annexure is provided by way of general information and does not and is not intended to constitute legal advice.

01. The Corporations Act gives special protection to disclosures about any misconduct or an improper state of affairs or circumstances relating to Telstra if the following conditions are satisfied:
 - A. The individual reporting the information is or has been:
 - a. an employee of the Telstra Group;
 - b. a director, secretary or officer of an entity of the Telstra Group;
 - c. an individual, or employee of a person, who supplies goods or services to any entity of the Telstra Group (whether paid or unpaid);
 - d. an associate of any entity of the Telstra Group; and
 - e. certain relatives or dependents of one of the above individuals, referred to in (a) to (d), or of that person's spouse.
 - B. The individual reports the information to:
 - a. a director, secretary, officer or senior manager of the Telstra Group;
 - b. ASIC, APRA or a prescribed Commonwealth authority;
 - c. the Telstra Group's external auditor (or a member of that external audit team)⁴;
 - d. an actuary of a company within the Telstra Group;
 - e. A designated Whistleblower Protection Officer; and
 - f. Any other person authorised by the Telstra Group to receive disclosures, including certain members of Telstra's Whistleblowing Committee or NAVEX, Telstra's whistleblowing service provider.
 - C. The individual has reasonable grounds to suspect that the disclosed information concerns *misconduct or an improper state of affairs or circumstances* in relation to the Telstra Group, including where the Telstra Group or an office or employee of the Telstra Group has engaged in conduct that:
 - a. contravenes the Corporations Act or certain other Commonwealth laws;
 - b. constitutes an offence under any Commonwealth law punishable by at least 12 months of imprisonment; or
 - c. represents a danger to the public or the financial system; or
 - d. is otherwise prescribed by regulation.
02. The following conduct may be found to breach the Corporations Act: Insider trading, insolvent trading, breach of the continuous disclosure rules, failure to keep accurate financial records, falsification of records and accounts, and breach of directors' duties – e.g. failure of a director or other officer of the Telstra Group to act in good faith, or in the best interest of the company or having a personal conflicted interest.
03. Certain exemptions apply, such as in respect of certain disclosures relating to solely work-related personal grievances.
04. The Corporations Act also gives special protection to disclosures about any misconduct or an improper state of affairs or circumstances relating to the Telstra Group if the report is made to a legal practitioner, for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower regime in the Corporations Act.

⁴ Telstra Group's external auditor can be found in its annual report and as at May 2019 was Ernst & Young.



05. If you meet the above conditions, the Corporations Act⁵:

- (a) makes it an offence to disclose your identity (or information which could identify you) without your consent or unless an exception applies. The exceptions include disclosures to ASIC, APRA, the AFP, a legal practitioner to obtain legal advice as to the operation of these provisions of the Corporations Act or to a body or person prescribed by regulations.
- (b) protects you from being subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure;
- (c) protects you from enforcement or exercise of any contractual or other remedy or right on the basis of the disclosure;
- (d) prevents the use of the information you disclosed as evidence against you in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information;
- (e) gives you qualified privilege in respect of the disclosure (relevant to the law of defamation);
- (f) prevents a contract to which you are a party from being terminated on the basis that the disclosure is a breach of that contract;
- (g) gives you the right to bring legal proceedings seeking compensation or remedies in relation to any detrimental conduct experienced in connection with your disclosure, and may protect you from being ordered to pay costs in those proceedings;
- (h) may prevent your identity or information likely to lead to your identification being disclosed to a court or tribunal except where considered necessary;
- (i) makes it an offence for a person to engage in conduct that causes any detriment to you or another person, if that person does so because he or she believes or suspects that you or any other person made, may have made, proposes to make or could make a disclosure that qualifies for protection under the Act; and
- (j) makes it an offence for a person to threaten to cause detriment to you or another person with the intention for you to fear that the threat will be carried out if that person does so because you or any other person makes, or may make, a disclosure that qualifies for protection under the Act.

Detriment includes (but is not limited to): dismissal of an employee; injury of an employee in his or her employment; alteration of an employee's position or duties to his or her disadvantage; discrimination between an employee and other employees of the same employer; harassment or intimidation; harm or injury to a person, including psychological harm; property damage; reputational damage; damage to a person's business or financial position; and any other damage to a person.

However, a whistleblower may be held liable for any personal misconduct revealed by their disclosure.

06. A subsequent disclosure to a member of parliament or a journalist in limited circumstances of emergency or public interest disclosures may also qualify for protection. Please refer to the ASIC website or contact ASIC for further information regarding emergency and public interest disclosures.

Confidentiality

07. If a report is made, the identity of the discloser (and information likely to lead to their identification) must be kept confidential unless one of the following exceptions applies:

- (a) the discloser consents to the disclosure;

⁵ Part 9.4AA Corporations Act (2001) (Cth).



- (b) disclosure of details that might reveal the discloser's identity (but not the identity itself) is reasonably necessary for the effective investigation of the matter and all reasonable steps have been taken to reduce the risk of the discloser being identified;
- (c) the concern is reported to ASIC, APRA, or the AFP; or
- (d) the concern is raised with a lawyer for the purpose of obtaining legal advice or representation in relation to the operation of the whistleblower regime in the Act.



Annexure B – Special protections under the Taxation Administration Act

Note: This Annexure is provided by way of general information and does not and is not intended to constitute legal advice.

01. The Taxation Administration Act gives special protection to disclosures about any misconduct or an improper state of affairs or circumstances relating to the tax affairs of the Telstra Group or an associate of the Telstra Group if the following conditions are satisfied:
- A. The individual reporting the information is or has been:
 - a. an employee of the Telstra Group;
 - b. a director, secretary or officer of an entity of the Telstra Group;
 - c. an individual, or employee of a person, who supplies goods or services to any entity of the Telstra Group (whether paid or unpaid);
 - d. an Associate⁶ of any entity of the Telstra Group; and
 - e. a spouse or child of one of the above individuals, referred to in (a) to (d), or a dependant of an individual referred to in (a) to (d) or of that person's spouse.
 - B. The whistleblower reports the information to:
 - a. a director, secretary or senior manager of the Telstra Group;
 - b. the Telstra Group's external auditor (or a member of that external audit team)⁷;
 - c. a registered tax agent or BAS agent⁸ who provides tax or BAS services to any company within the Telstra Group;
 - d. any other employee or officer of the Telstra Group who has functions or duties relating to tax affairs⁹ of the company (eg an internal accountant)
 - e. any other person authorised by the Telstra Group to receive disclosures, including certain member of Telstra's Whistleblowing Committee and NAVEX, Telstra's whistleblowing service provider (together, (a) to (e) are the **Eligible Recipients**);
 - f. the Australian Commissioner of Taxation; and
 - g. a legal practitioner.
 - C. If the report is made to an Eligible Recipient, the whistleblower:
 - a. has reasonable grounds to suspect the information concerns misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the Telstra Group or an Associate¹⁰ of an entity within Telstra Group; and
 - b. considers the information may assist the Eligible Recipient to perform functions or duties in relation to the tax affairs of a Telstra Group entity or Associate¹¹ of an entity within the Telstra Group.
 - D. If the report is made to the Australian Commissioner of Taxation, the whistleblower considers that the information may assist the Australian Commissioner for Taxation to perform his or her duties under a taxation law in relation to an entity with the Telstra Group or an Associate¹² of an entity within the Telstra Group.

⁶ Within the meaning of section 318 of the *Income Tax Assessment Act 1936*.

⁷ Telstra Group's external auditor can be found in its annual report and as at May 2019 was Ernst & Young.

⁸ Within the meaning of the *Tax Agent Services Act 2009*.

⁹ Within the meaning of s 14ZZT of the Taxation Administration Act.

¹⁰ Within the meaning of section 318 of the *Income Tax Assessment Act 1936*.

¹¹ Within the meaning of section 318 of the *Income Tax Assessment Act 1936*.

¹² Within the meaning of section 318 of the *Income Tax Assessment Act 1936*.



- E. If the report is made to a legal practitioner, for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower regime in the Taxation Administration Act.

02. If you meet the above conditions, the Taxation Administration Act:

- (a) protects you from being subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure;
- (b) protects you from enforcement or exercise of any contractual or other remedy or right on the basis of the disclosure;
- (c) where the disclosure was made to the Australian Commissioner of Taxation, prevents the use of the information you disclosed as evidence against you in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information;
- (d) gives you qualified privilege in respect of the disclosure (relevant to the law of defamation);
- (e) prevents a contract to which you are a party from being terminated on the basis that the disclosure is a breach of that contract;
- (f) gives you the right to bring legal proceedings seeking compensation or remedies in relation to any detrimental conduct experienced in connection with your disclosure, and may protect you from being ordered to pay costs in those proceedings;
- (g) may prevent your identity or information likely to lead to your identification being disclosed to a court or tribunal except where considered necessary;
- (h) makes it an offence for a person to engage in conduct that causes any detriment to you or another person, if that person does so because he or she believes or suspects that you or any other person made, may have made, proposes to make or could make a disclosure that qualifies for protection under the Taxation Administration Act; and
- (i) makes it an offence for a person to threaten to cause detriment to you or another person with the intention for you to fear that the threat will be carried out if that person does so because you or any other person makes, or may make, a disclosure that qualifies for protection under the Taxation Administration Act.

Detriment includes (but is not limited to): dismissal of an employee; injury of an employee in his or her employment; alteration of an employee's position or duties to his or her disadvantage; discrimination between an employee and other employees of the same employer; harassment or intimidation; harm or injury to a person, including psychological harm; property damage; reputational damage; damage to a person's business or financial position; and any other damage to a person.

However, a whistleblower may be held liable for any personal misconduct revealed by their disclosure.

Confidentiality

03. If a report is made, the identity of the discloser (and information likely to lead to their identification) must be kept confidential unless one of the following exceptions applies:

- (a) the discloser consents to the disclosure;
- (b) the disclosure is made to the Australian Commissioner for Taxation;
- (c) disclosure of details that might reveal the discloser's identity (but not the identity itself) is reasonably necessary for the effective investigation of the matter and all reasonable steps have been taken to reduce the risk of the discloser being identified;



- (d) the concern is reported to the Australian Federal Police; or
- (e) the concern is raised with a lawyer for the purpose of obtaining legal advice or representation in relation to the operation of the whistleblower regime in the Act.



Country Schedules

China

Further Requirements

In addition to the Whistleblowing Policy ("Policy"), please note the following if you are reporting from PRC or your concern or report relates to anyone or any conduct connected to Telstra Group's business in PRC, or any company within the Telstra Group incorporated in the PRC.

Investigation process

Where a disclosure has been received in accordance with this Policy, the discloser (assuming that his/her identity is known) will be kept informed in a timely manner of any decisions to investigate the disclosure and when the investigation is completed.

Reportable Conduct and Protections

This Policy contains examples of what may constitute types of misconduct that can be reported on ("Reportable Conduct") and are subject to protections under this Policy and/or whistleblowing laws. This list is not meant to be exhaustive and there are other examples.

In China, other types of Reportable Conduct include violations of the laws, regulations or rules on labour and social security which may be reported either internally through Telstra's whistleblowing channels or to the Labour and Social Security Administration Department.

India

Further Requirements

In addition to the Whistleblowing Policy ("Policy"), please note the following if you are reporting from India or your concern or report relates to anyone or any conduct connected to Telstra Group's business in India, or any company within the Telstra Group incorporated in India (**Telstra India**).

Investigation Process

Telstra India's board will nominate a director responsible for overseeing the whistleblowing process. Reportable Conduct may be reported directly to this director in appropriate and exceptional cases.

Complaints relating to workplace sexual harassment falls outside the scope of this Policy and should be reported to, and will be investigated by, the designated internal complaints committee.

Publication

Details of the establishment of the whistleblower processes are published on Telstra's website and Telstra India's intranet and in the Telstra India board's report.



Japan

Further Requirements

In addition to the Whistleblowing Policy ("Policy"), please note the following if you are reporting from Japan or your concern or report relates to anyone or any conduct connected to Telstra Group's business in Japan, or any company within the Telstra Group incorporated in Japan.

Reportable Conduct

This Policy contains examples of what may constitute types of misconduct that can be reported ("Reportable Conduct") and are subject to protections under this Policy and/or whistleblowing laws. This list is not meant to be exhaustive and there are other examples.

In Japan, other types of misconduct could include any illegal act that violates the statutes set out in the appendix attached to the Japanese Whistleblower Protection Act or statutes concerning the protection of an individual's life, health, property and other interests.

In order to attract protections in Japan, the disclosure must not be for the purpose of gaining illegal benefits, causing damage to the legitimate interests of others or attaining an illegal objective.

Protections

In addition to the protections set out in this Policy, in the case of dispatched workers (being temporary workers contracted by an agency), the dispatch agreement may not be terminated and/or the agency dispatching the worker may not be asked to replace the worker because of the disclosure.

Investigation process

Where a disclosure has been received in writing, the discloser shall be notified:

- within 20 days following the disclosure about the commencement of an investigation;
- without delay after conclusion of the investigation, that measures have been taken to stop the Reportable Conduct, or that other remedial measures have been taken or that the investigation undertaken has not verified the Reportable Conduct.



New Zealand

Further Requirements

In addition to the Whistleblowing Policy ("Policy"), please note the following if you are reporting from New Zealand or your concern or report relates to anyone or any conduct connected to Telstra Group's business in New Zealand, or any company within the Telstra Group incorporated in New Zealand ("**Telstra NZ**").

Individuals covered by this Policy

Individuals who may make protected disclosures under this Policy are set out in the Policy. These include "employees", which in turn for the purpose of this Policy include former employees, homeworkers (as defined by the Employment Relations Act 2000), contractors, people seconded to Telstra NZ and volunteers.

Reportable Conduct

The Policy contains examples of what may constitute types of misconduct that can be reported ("Reportable Conduct") and are subject to protections under this Policy and/or whistleblowing laws. This list is not meant to be exhaustive and there are other examples.

In New Zealand, other types of misconduct could include conduct that

- poses a serious risk to public health or public safety or the environment;
- constitutes a serious risk to the maintenance of law, including the prevention, investigation, and detection of offences and the right to a fair trial;
- constitutes a criminal offence.

Disclosures to Others

If you are reporting from New Zealand or your concern or report relates to Telstra NZ you may, in some circumstances, also make protected disclosures to appropriate authorities. Please see the New Zealand Ombudsman's website for details: <http://www.ombudsman.parliament.nz/what-we-do/protecting-your-rights/protected-disclosures-whistle-blowing>

Confidentiality

In addition to the protections outlined in the Policy, if you are an employee of Telstra NZ (as described above), we will use our best endeavours not to disclose information that might lead to your identification unless:

- (a) you consent in writing to the disclosure of that information; or
- (b) disclosure of identifying information is essential
 - i. to the effective investigation of the allegations in the protected disclosure; or
 - ii. to prevent serious risk to public health or public safety or the environment; or
 - iii. having regard to the principles of natural justice.



South Korea

Further Requirements

In addition to the Whistleblowing Policy ("Policy"), please note the following if you are reporting from South Korea or your concern or report relates to anyone or any conduct connected to Telstra Group's business in South Korea, or any company within the Telstra Group incorporated in South Korea.

Individuals covered by this Policy

Individuals who may make protected disclosures under this Policy and/or relevant laws in South Korea are set out in the Policy. In addition to the individuals identified in the Policy, under South Korean law, any person making a report regarding conduct detrimental to the public interest may be subject to protections.

Reportable Conduct

This Policy contains examples of what may constitute types of misconduct that can be reported ("Reportable Conduct") and are subject to protections under the Policy and/or whistleblowing laws. This list is not meant to be exhaustive and there are other examples.

In South Korea, any person may report conduct detrimental to the public interest ("Public Interest Report") which means conduct detrimental to the health and safety of the public, the environment, the interests of consumers and fair competition which violate any of the laws listed in the table annexed to the Act of Protection of Public Interest Reporters (APPIR).

Protections

In addition to the protections set out in the Policy, no person may interfere with filing a Public Interest Report, or compel the reporting party to withdraw a Public Interest Report.



South Africa

Further Requirements

In addition to the Whistleblowing Policy ("Policy"), please note the following if you are reporting from South Africa or your concern or report relates to anyone or any conduct connected to Telstra Group's business in South Africa, or any company within the Telstra Group incorporated in South Africa ("**Telstra South Africa**").

Individuals covered by the Policy

Individuals who may make protected disclosures under this Policy and/or relevant laws in South Africa are set out in the Policy. These include "employees" and "workers", who in turn include any one who:

- in any manner assists or assisted in carrying on or conducting or conducted the business of an employer, including as an independent contractor, consultant or agent; or
- works or worked for another person, including as an independent contractor, consultant or agent; or
- renders services to a client while being employed by a temporary employment service.

Reportable Conduct

The Policy contains examples of what may constitute types of misconduct that can be reported ("Reportable Conduct") and are subject to protections under this Policy and/or whistleblowing laws. This list is not meant to be exhaustive and there are other examples.

In South Africa, protected disclosures include information on the conduct of an employer or another employee which might include:

- a criminal offence, e.g. theft;
- a failure to comply with a legal obligation, e.g. meeting income tax or department of labour obligations;
- a miscarriage of justice;
- endangering health and safety;
- damaging the environment;
- unfair discrimination; and/or
- the deliberate concealment of any of the above.

Disclosures to others

If you are reporting from South Africa or your concern or report relates to Telstra South Africa you may, under certain circumstances, also make protected disclosures to others, including appropriate authorities. It is recommended that you seek independent legal advice (at your own cost) before making a disclosure to others to ensure that such a disclosure is protected under South African law (in particular the Protected Disclosures Act). In any event disclosures, in order to be protected, need to be made in good faith and based on the reasonable belief that they are substantially true.

Investigation process

Where a disclosure has been received in accordance with this Policy, the discloser (assuming that his/her identity is known) will be kept informed of any decisions to investigate the disclosure and the outcome of any investigation.



United Kingdom

Further Requirements

In addition to the Whistleblowing Policy ("Policy"), please note the following if you are reporting from the UK or your concern or report relates to anyone or any conduct connected to Telstra Group's business in the UK, or any company within the Telstra Group incorporated in the United Kingdom ("**Telstra UK**").

Individuals covered by the Policy

Individuals who may make protected disclosures under the Policy are set out in the Policy. In the UK these include "employees" and "workers", which in turn for the purpose of this Policy include agency workers, individuals supplied through an intermediary personal services company, homeworkers, freelancers, and trainees.

Reportable Conduct

The Policy contains examples of what may constitute types of misconduct that can be reported ("Reportable Conduct") and are subject to protections under the Policy and/or whistleblowing laws. This list is not meant to be exhaustive and there are other examples.

In the UK, any disclosure of information may qualify for the protections set out in the Policy provided the disclosure is made with the reasonable belief that the disclosure is in the public interest, is substantially true, and contains information that one or more of the following has been, is being, or is likely to be, committed:

- criminal offences;
- breach of any legal obligations;
- miscarriages of justice;
- danger to the health or safety of any individual;
- damage to the environment; or
- the deliberate concealing of information about any of the above.

Disclosures to others

If you are reporting from the UK or your concern or report relates to Telstra UK you may, under certain circumstances, also make protected disclosures to others, including appropriate authorities. It is recommended that you seek independent legal advice (at your own cost) before making a disclosure to others to ensure that such a disclosure is protected under UK law (in particular the Public Interest Disclosure Act 1998). In any event disclosures, in order to be protected, need to be made with the reasonable belief that the disclosure is in the public interest, is substantially true, and is based on the reasonable belief that the facts provided in the disclosure show one or more of the six categories of Reportable Conduct listed above.



US

Further Requirements

In addition to the Whistleblowing Policy ("Policy"), please note the following if you are reporting from the US or your concern or report relates to anyone or any conduct connected to Telstra Group's business in the US, or any company within the Telstra Group incorporated in the US. ("**Telstra US**").

Individuals covered by the Policy

Individuals who may make protected disclosures under the Policy are set out in the Policy. However, the US legal system contains a number of federal, state and local laws that provide for whistleblower and non-retaliation protections for making a disclosure ("US Whistleblower Laws"), and there may be additional persons who may make protected disclosures under these laws.

Reportable Conduct

The Policy sets out types of misconduct that can be reported ("Reportable Conduct") and are subject to protections under the Policy. This list is not meant to be exhaustive and there may be other types of conduct, the disclosure of which may be protected under US Whistleblower Laws.

However, this Policy and the processes referred to in the Policy do not apply to personal work-related grievances, unless the complaint is about your victimisation as a whistleblower. Examples of personal work-related grievances include disclosures regarding interpersonal conflicts with other employees, complaints related to equal employment matters, discrimination, harassment, sexual or otherwise, transfer and promotion decisions, decisions regarding the terms and conditions of employment, decisions regarding suspension and termination of employment and disciplinary decisions. For details on how to report complaints that are not covered by this Policy, please consult the Telstra US Incorporated Handbook for Employees."

Disclosures to others

Nothing in this Policy, or any other Telstra US policy or agreement, shall prohibit whistleblowers from reporting suspected violations of law or regulation to any governmental agency, regulatory body, self-regulatory organization, or law enforcement agency (collectively a "law enforcement entity"), from participating or cooperating in any inquiry, investigation, or proceeding conducted by such law enforcement entity, or from making other disclosures that are protected under state or federal law or regulation.

Although whistleblowers are encouraged to use Telstra US's established internal reporting lines identified in this Policy, no prior authorization of Telstra US is needed for a whistleblower to make reports or disclosures of possible or suspected violations of law or regulation to a law enforcement entity, and whistleblowers are not required to first notify Telstra US that such reports or disclosures have been made.

Protections

In addition to the protections set out in the Policy, there may be further protections provided to the whistleblower under US Whistleblower Laws.



Sweden

Further Requirements

In addition to the Whistleblowing Policy ("Policy"), please note the following if you are reporting from Sweden or your concern or report relates to anyone or any conduct connected to Telstra Group's business in Sweden, or any company within the Telstra Group incorporated in Sweden. ("**Telstra Sweden**").

Individuals covered by the Policy

Individuals who may make protected disclosures under the Policy are set out in the Policy. In Sweden these also include temporary agency workers hired by Telstra Sweden.

Disclosures to Others

If you are reporting from Sweden or your concern or report relates to Telstra Sweden you may also make protected disclosures to your employee organisation, and, under certain circumstances, a public authority. It is recommended that you seek independent legal advice (at your own cost) before making a disclosure to others to ensure that such a disclosure is protected under Swedish law (in particular the Whistleblower Act). In any event disclosures, in order to be protected, need to be made on the reasonable grounds of belief that they are true.

France

Further Requirements

In addition to the Whistleblowing Policy ("Policy"), please note the following if you are reporting from France or your concern or report relates to anyone or any conduct connected to Telstra Group's business in France, or any company within the Telstra Group incorporated in France. ("**Telstra France**").

Personal Data

The data provided in the disclosure and collected in the course of any investigation

- may be transferred to a country outside the European Community;
- will be immediately destroyed if and as soon as the disclosure is found to be inadmissible under this Policy;
- will be destroyed or archived (once anonymised) within 2 months of the end of the investigation process if the disclosure and ensuing investigation did not result in any disciplinary or legal proceedings being taken; and
- will be kept by the individuals in charge of managing the alerts, when disciplinary or legal proceedings are initiated against the person implicated or the author of an abusive alert, until the end of the applicable proceedings.

You and any person(s) referred to in the disclosure have the right to consult and rectify any information recorded about them within the framework of the whistleblowing system and oppose the processing thereof save as provided for in this Policy.