



Whistleblowing Policy

Group Policy Level 1

Overview: Use this Group Policy if you want to know more about our Whistleblowing Process. Acting ethically and with integrity is core to what Telstra stands for. This Group Policy is designed to support you and take action if you have concerns about illegal, unethical or improper conduct. This Group Policy should be read with the Whistleblowing Investigation Process. This Group Policy also provides you with support and protections available to you in making a disclosure. Telstra has an Ethical Behaviour Framework and this Group Policy supports that framework. You are expected to read, understand and comply with these documents.

Scope: This Group Policy applies to all directors, employees and contractors of Telstra Group Limited ('Telstra'), and its controlled entities (collectively, 'Telstra Group') and to any other person notified that this Group Policy applies to them, unless an exemption has been granted. In this Group Policy, a reference to 'our' or 'we' is a reference to the Telstra Group unless the context requires otherwise.

Application: This Group Policy applies in all jurisdictions in which we operate. Where local law or country-specific requirements are inconsistent with any part of this Group Policy then those requirements, laws and/or local Policy apply in relation to that part instead.

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Policy Owner: HR Executive Director
Approval: PGC

N.B. This Policy does not form part of any employment contract and Telstra may vary, revoke or replace this Policy from time to time.



Contents

Whistleblowing Policy	1
Policy Principles	4
Who does this policy apply to?	4
What is reportable conduct?	4
How do I make a disclosure under this policy?	5
Whistleblowing Service	5
Telstra Group Whistleblowing Committee	5
Designated Whistleblower Protection Officer	6
Telstra Group Officers, Directors and Group Executives	6
Disclosures to others	6
Disclosures made by email	6
How this policy interacts with the Australian Whistleblower laws	6
Protections provided to persons making disclosures	7
Protection from detriment	7
Protection from civil, criminal and administrative liability	7
Compensation and other remedies	7
Legal advice	8
Support	8
Confidentiality and anonymous disclosures	8
Investigation process	8
Training	9
Reporting and governance	9
Publication	9
Review	10
Further information	10
Breach of Policy	10
Country Schedules	11
Canada	11
China	11
Fiji	11
France	12
India	12
Ireland	12
Italy	13
Japan	13
Netherlands	13
New Zealand	14
Papua New Guinea	14
South Korea	15
South Africa	15
Sweden	16
United Kingdom	17
United States of America	17

Effective Date: 3 December 2025
Policy Owner: HR Executive Director
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Appendix 1 – NAVEX Global – EthicsPoints contact details.....	18
References	20
Attachments.....	21
Document control sheet	21

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Policy Principles

Who does this policy apply to?

1. 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 Group Limited ('Telstra'), including the controlled entities in the Telstra Group (collectively the 'Telstra Group').
2. 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.
3. This is a policy of the Telstra Group and any other entity notified that this policy applies to it. In addition to the individuals listed in paragraph [2] above, the policy applies to all Telstra Group directors, officers, employees and contractors and to any other person notified that this policy applies to them. The policy provides protections and complies with the Australian Whistleblower laws, as a minimum standard. You can make a disclosure regardless of where you are located around the world, or where the conduct is occurring. If your disclosure concerns conduct, people or operations located outside Australia, there may be 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 policy apply in full. References to "Whistleblowing laws" include Australian Whistleblowing laws and the laws of the jurisdictions in which the Telstra Group's businesses operate.

What is reportable conduct?

4. Disclosures do not have to be about breaking the law. 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 (**Reportable Conduct**).
5. Under this policy, Reportable Conduct includes:
 - a) conduct that 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) conduct that amounts to a serious criminal offence;
 - c) conduct that is a serious breach of any internal Telstra Group Policy, including the Code of Conduct;
 - d) negligence, default, breach of trust or breach of duty;
 - e) any conduct that may indicate a systemic issue in relation to Telstra Group;
 - f) conduct relating to business behaviours and practices that may cause consumer harm;
 - g) 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; or
 - h) conduct that represents a danger to the public or the financial system.
6. Reportable Conduct does not include solely personal work-related grievances, unless the complaint is about your victimisation as a whistleblower or falls into one or more of the categories listed below at paragraph [8].
7. Examples of solely 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.
8. A personal work-related grievance may still be considered Reportable Conduct under this policy if:

Effective Date: 3 December 2025
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- a) it is a mixed disclosure that includes information about misconduct within the Telstra Group (as well as a personal work-related grievance);
- b) the Telstra Group has broken employment or other laws which are punishable by imprisonment for a period of 12 months or more or acted in a way that is a threat to public safety; or
- c) the disclosure relates to information that suggests misconduct that goes further than one person's personal circumstances.

If you are unclear on whether your disclosure is a personal work-related grievance please contact the Whistleblowing Protection Officer or submit a query through the Whistleblowing Service (details below).

- 9. You may still qualify for protection under the Whistleblower laws if your disclosure turns out to be incorrect, but you must have reasonable grounds for suspecting that the information you are disclosing concerns Reportable Conduct. A disclosure made without reasonable grounds (such as where you know it to be false) may amount to misconduct and be subject to disciplinary action.
- 10. Disclosures that are not about Reportable Conduct do not qualify for protections under the Whistleblower laws but the Telstra Group may still investigate even if your disclosure does not qualify for protections under the Whistleblower laws and may elect to provide those protections provided under the laws.

How do I make a disclosure under this policy?

- 11. 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 the Whistleblower laws. You may wish to obtain independent legal advice at your own expense before making a disclosure.

Whistleblowing Service

- 12. 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 disclosures. The Whistleblowing Service is available 24 hours a day, 7 days a week, all year round. Disclosures to the Whistleblowing Service can be made in multiple languages, with translation and interpretation services available.

For the purposes of this policy to ensure appropriate escalation and timely investigation, we request that disclosures are made through the Whistleblowing Service. Any queries about how this Whistleblowing Policy operates should also be submitted through the Whistleblowing Service.

- 13. Reportable Conduct can be disclosed to the Telstra Group's Whistleblowing Service via phone or online:
 - o **Webform:** [Telstra's Whistleblowing Service](#)
 - o **Phone:** [Global Contact Phone Numbers \(see Appendix 1\)](#)

Whistleblowing Service staff are experienced in handling sensitive disclosures. 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

- 14. 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

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

Telstra Group Officers, Directors and Group Executives

16. Reportable Conduct can also be disclosed to any Telstra Group Directors¹, officers² or Group Executives.³

Disclosures to others

17. By law, you may also receive certain protections if you make disclosures to:
- a) Telstra Group's auditor (or a member of that firm's audit team);
 - b) the Telstra Group Internal Auditor (if you make a disclosure to the internal auditor you are encouraged to let them know that you wish to disclose the matter as a whistleblower under the Whistleblower laws or this policy);
 - c) 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; or
 - d) 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

18. 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 under this policy must comply with all aspects of this policy, including the confidentiality requirements set out below.

How this policy interacts with the Australian Whistleblower laws

19. By making a disclosure in accordance with this policy, you may be protected under the Whistleblower laws if the type of matter you disclose is protected by those laws.
20. While this policy principally deals with internal disclosures, the protections afforded by the Whistleblower laws (set out below) also include some types of disclosure made to external parties, such as:
- a) legal representatives, to obtain advice or representation about the Whistleblower laws;
 - b) ASIC, APRA or the ATO; or
 - c) MPs or journalists, where you have reasonable grounds to believe that making the further disclosure would be in the public interest or the information concerns a substantial and imminent danger to the health or safety to one or more persons or to the natural environment, but only if:
 - i. you previously made a disclosure of that information to either ASIC, APRA or another Commonwealth body prescribed by regulation; and
 - ii. you notified that body in writing of your intention to disclose to an MP or

¹ This means Telstra Group 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 all Telstra 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.



journalist (where, for public interest disclosures, at least 90 days must first have passed since your previous disclosure before this notice may be given).

It is important you understand strict criteria apply and you should obtain independent legal advice before making a disclosure to an MP or journalist.

For more information about the Whistleblower laws (including how to make a disclosure directly to ASIC or the ATO), see the information available on the [ASIC](#) website (including [Information Sheet 239](#) How ASIC handles whistleblower reports and [Information Sheet 247](#) Company officer obligations under the whistleblower protection provisions) and the [ATO](#) website.

Protections provided to persons making disclosures

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

Protection from detriment

22. The Telstra Group is committed to ensuring that you are protected from any threatened or actual detriment connected with:
 - a) disclosing Reportable Conduct under this policy;
 - b) proposing to disclose Reportable Conduct under this policy; or
 - c) being suspected of disclosing Reportable Conduct under this policy.
23. Detriment includes (but is not limited to) 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.
24. However, not all actions taken by the Telstra Group will be considered detrimental conduct. For example, administrative action that is reasonable for the purpose of protecting you from detriment, or management of unsatisfactory work performance, is not detrimental conduct.

Telstra Group directors, officers, employees and contractors must not cause or threaten any detriment to a person because that person has or proposes to make a disclosure protected by this policy or by Whistleblower laws.
25. However, a person may be held liable for any misconduct that they have engaged in that is revealed by their disclosure under this policy (or revealed by an investigation following their disclosure).
26. 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.
27. In Australia, you can also contact a relevant regulator, such as ASIC, if you are concerned that you have not been protected in accordance with Whistleblower laws, including if you believe you have been subjected to or threatened with detrimental treatment. However, the Telstra Group is still committed to protecting your identity and protecting you from detriment, as set out in this policy, even if you are not covered by the Whistleblower laws.

Protection from civil, criminal and administrative liability

28. If you make a disclosure protected by the Whistleblower laws, you will also be protected from any:
 - a) civil liability - for example, any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation;
 - b) criminal liability - for example, prosecution for unlawfully releasing information or unlawfully using your disclosure against you in a prosecution; and
 - c) administrative liability - for example, disciplinary action for making a disclosure.

Compensation and other remedies

29. You may seek compensation and other remedies through the courts if you suffer loss, damage or injury because you made a disclosure protected by the Whistleblower laws and we failed to take reasonable precautions and exercise due diligence to prevent detrimental conduct.

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Legal advice

30. If you seek legal advice at your own expense in relation to a disclosure under this policy or under the Whistleblower laws, that disclosure and advice will be protected by legal professional privilege.

Support

31. The Telstra Group recognises that making a disclosure under this policy can be a difficult thing to do. Telstra Group employees and their families can contact Telstra Group'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

32. 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) It is not possible to investigate the disclosure without disclosing information that might identify you (but all reasonable steps must be taken to protect your identity);
 - c) Telstra Group considers it appropriate to disclose 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;
 - d) That disclosure is compelled by law; or
 - e) We raise the concern with a lawyer for the purpose of seeking legal advice or representation in relation to the operation of Whistleblower laws.
33. Telstra Group will take all reasonable steps to ensure your identity is protected throughout the investigation process, and after the investigation has concluded. This will be done through a number of practical measures, including by ensuring investigations are handled and investigated by a separate, qualified investigation team, reminding those interviewed in association with your disclosure of their duties to keep the matter confidential, and ensuring records and materials related to the disclosure are stored securely.
34. 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.
35. You may also choose to remain anonymous in making a disclosure under this policy. You can choose to remain anonymous over the course of the investigation and after the investigation is finalised. If you choose to remain anonymous, you may still be asked to provide some details so that the disclosure can be adequately investigated. You can refuse to answer questions that you feel could reveal your identity at any time, including during follow up conversations. It may not be possible to investigate the disclosure as thoroughly if it is made without sufficient details and you have not provided a means to contact you to request further information.
36. 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.
37. If you believe your identity has not been kept confidential then you should contact the Whistleblower Protection Officer who will review the allegation. You may also lodge a complaint with a regulator, such as ASIC or the ATO, for investigation.

Investigation process

38. Disclosures of Reportable Conduct will be investigated in accordance with the Whistleblowing Investigation Process, but investigations may vary depending on the nature of the disclosure.

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39. Once a disclosure is received, an investigator will be assigned to investigate the matter on behalf of the Whistleblowing Committee. Either the investigator or the Whistleblowing Committee will consider:
 - a) the nature and scope of the investigation;
 - b) the persons within and outside the entity that should lead the investigation; and
 - c) the nature of any technical, financial or legal advice that may be required to support the investigation.
40. 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. We encourage you to raise any concerns you have about the investigation of your disclosure (including breach of confidentiality) with the Whistleblower Protection Officer or the person to whom you made your disclosure.
41. 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 Group policies and processes in relation to our people.
42. When the investigator has finalised the investigation they 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.
43. The time taken to investigate a matter will depend on the complexity of the matter and the nature of the disclosure made. Information on average timeframes for investigating disclosures will be published on the Telstra Whistleblowing intranet page at the end of each financial year.
44. We will contact you to acknowledge receipt of your disclosure, if we require clarification or more information to advance the investigation, and when the investigation has concluded, unless you have provided no way of getting in touch. We will provide you with regular updates if you can be contacted but updates may vary depending on the nature of the report. There may be circumstances where it may not be appropriate to provide details of the outcome of the disclosure.
45. 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.
46. If you are not satisfied that your disclosure has been investigated and acted upon appropriately in accordance with this policy, you may contact the Chief Compliance Officer to request a review of whether the investigation process has been followed. The investigation may not be reopened if it is found that the investigation was conducted properly, or no new information is available.

Training

47. The Telstra Group will provide training for employees and officers about this policy (including those in any overseas-based operations), 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

48. 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 People & Remuneration Committee on material incidents and on the operation of this policy.

Publication

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



Review

50. This policy is current as at 3 December 2025 and will be periodically reviewed to ensure it is operating effectively, and to make any changes required.

Further information

51. We encourage you to contact the Whistleblower Protection Officer if you have any questions about this policy including what it covers and how disclosures will be handled.

Breach of Policy

Compliance with this Group Policy will be monitored. If you don't comply with this Group Policy you could face disciplinary action. This may include termination of your employment or engagement. A breach of this policy may also amount to a civil or criminal contravention under the Whistleblower laws, giving rise to significant penalties.



Country Schedules

In addition to the Whistleblowing Policy ("Policy"), please note the following country schedule may apply if you are reporting from any of the jurisdictions listed below, or your concern or report relates to anyone or any conduct connected to Telstra Group's business in the relevant jurisdiction, or any company within the Telstra Group incorporated in the relevant jurisdiction.

Canada

Disclosures to others

If you are reporting from Canada or your concern or report relates to Telstra's business in Canada or any company within the Telstra Group incorporated in Canada, 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 Canadian law.

Protections

In addition to the protections set out in this Policy, no detriment may be caused or threatened to be caused to a discloser who has, or has expressed an intent to, provide information to a person whose duties include the enforcement of Canadian federal or provincial law respecting an offence that the employee has been or is being committed contrary to any Canadian federal or provincial act or regulation by the Telstra Group, or one or more of its directors.

China

Investigation process

Where a disclosure has been received in accordance with this Policy, the discloser (assuming that their 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

In addition to the examples contained in the Policy, 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.

Fiji

Individuals covered by the Policy

Individuals who may make protected disclosures under this Policy are set out in the Policy. In addition, whistleblower protections may also be available under Fijian law for employees, directors, secretaries or suppliers of goods or services (or their employees) of Telstra Group companies that are formed or registered in Fiji. To qualify for whistleblower protection under Fiji's Companies Act 2015, the discloser is required to inform the person to whom the disclosure is made of their name before making the disclosure.

Reportable Conduct

In addition to the examples contained in the Policy, in relation to Telstra's business in Fiji or any company within the Telstra Group incorporated in Fiji, you can make a disclosure under this Policy if you have reasonable grounds to suspect that you have information indicating that:

- the company has, or may have, contravened a provision of the Companies Act 2015; or
- an employee or officer of the company has, or may have, contravened a provision of the Companies Act 2015.

Disclosures to others

If you are reporting from Fiji or your concern or report relates to Telstra's business in Fiji or any company within the Telstra Group incorporated in Fiji you may, under certain circumstances, also make protected disclosures to Fiji's Registrar of Companies, the Deputy Registrar, an Assistant Registrar or any other officer performing the role of the Registrar of Companies. It is recommended



that you seek independent legal advice (at your own cost) before making a disclosure to the Registrar of Companies, the Deputy Registrar, an Assistant Registrar or any other officer performing the role of the Registrar of Companies to ensure that such a disclosure is protected under Fiji law (in particular the Companies Act 2015). In any event, disclosures, in order to be protected, need to be made in good faith.

Confidentiality

In addition to the protections outlined in the Policy, if you make a protected disclosure under the Companies Act 2015 we will use our best endeavours not to disclose information that might lead to your identification unless:

- you consent to the disclosure of that information; or
- disclosure is made to the Registrar of Companies in accordance with the Companies Act 2015.

Protections

In addition to the protections set out in this Policy, a person who has made a protected disclosure under the Companies Act 2015 receives qualified privilege in respect of the disclosure and any contract to which such person is a party may not be terminated on the basis that the disclosure constitutes a breach of the contract.

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.

India

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.

Ireland

Individuals covered by the Policy

Individuals who may make protected disclosures under this Policy and/or relevant laws in Ireland are set out in the Policy. Under the Irish law, in the context of Protected Disclosure Act 2014, "workers" and "employees" include:

- former employees;
- people working under a contract for services;
- independent contractors;
- trainees, temporary workers, interns, and those on work experience



Reportable Conduct

In addition to the examples contained in the Policy, in Ireland, other types of Reportable Conduct include conduct which:

- constitutes a criminal offence;
- constitutes a failure to comply with legal obligations;
- endangers the health and safety of individuals;
- damages the environment;
- constitutes a miscarriage of justice or misuse of public funds;
- constitutes a concealment or destruction of information about any Reportable Conduct.

Disclosures to others

If you are reporting from Ireland or your concern or report relates to Telstra's business in Ireland or any company within the Telstra Group incorporated in Ireland, you may, under certain circumstances, also make protected disclosures to others including a relevant prescribed person listed in the Protected Disclosures Act 2014 (Disclosure to Prescribed Persons) Order 2020. 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 the Irish law (in particular the Protected Disclosures Act 2014). Disclosures, in order to be protected, need to be made in good faith and based on the reasonable belief that they are substantially true.

Italy

Report of retaliatory measures

If you are reporting from Italy or your concern or report relates to Telstra's business in Italy or any company within the Telstra Group incorporated in Italy, you can report the retaliatory or detrimental measure taken against you as a result of your report of Reportable Conduct to the National Labour Inspectorate.

Japan

Reportable Conduct

In addition to the examples contained in this policy, in Japan, other types of Reportable Conduct 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.

Netherlands

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, contractors, interns and volunteers who acted properly and in good faith by reporting a misconduct.



Reportable Conduct

In addition to the examples contained in the Policy, in the Netherlands, other types of Reportable Conduct include conduct which:

- constitutes a breach of law;
- poses a threat to public health, safety or environment.

New Zealand

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 any company within the Telstra Group incorporated in New Zealand ("Telstra NZ") and volunteers.

Reportable Conduct

In addition to the examples contained in the Policy, in New Zealand, other types of Reportable Conduct include conduct

- 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>

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.

Papua New Guinea

Reportable Conduct

In addition to the examples contained in the Policy, in Papua New Guinea, other types of Reportable Conduct include conduct which:

- poses an endangerment to health/safety of individuals or environmental damage;
- constitutes an unfair discrimination;
- constitutes a criminal offence, failure to comply with legal obligation, or miscarriage of justice; or



- is an act to conceal any Reportable Conduct.

Disclosures to others

If you are reporting from Papua New Guinea or your concern or report relates to Telstra's business in Papua New Guinea or any company within the Telstra Group incorporated in Papua New Guinea you may, under certain circumstances, also make protected disclosures to appropriate authorities. It is recommended that you seek independent legal advice (at your own cost) before making a disclosure to an authority to ensure that such a disclosure is protected under Papua New Guinea law (in particular the Whistleblower Act 2020). In any event, disclosures, in order to be protected, need to be made in good faith.

Protections

In addition to the protections set out in this Policy, an employee who has made a protected disclosure and who reasonably believes they may be or have been subject to detriment because of the disclosure may apply to be transferred to another position with Telstra Papua New Guinea.

A disclosure will not be protected under Papua New Guinea law if you commit an offence by making the disclosure. It is also an offence to intentionally make a false or misleading disclosure.

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

In addition to the examples of Reportable Conduct contained in the Policy, 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). A person may have the option engage a lawyer, at public expense, to prepare and file an anonymous report.

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

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

In addition to the examples of Reportable Conduct contained in the Policy, 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's business in South Africa or any company within the Telstra Group incorporated in 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 their identity is known) will be kept informed of any decisions to investigate the disclosure and the outcome of any investigation.

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 any company within the Telstra Group incorporated in Sweden ("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.

Investigation process

We will confirm receipt of a report of Reportable Conduct within 7 days. Where a disclosure has been received in accordance with this Policy, the discloser (assuming that their identity is known) will be kept informed in a timely manner of any decisions to investigate the disclosure and when the investigation is completed.

United Kingdom

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

In addition to the examples of Reportable Conduct contained in the Policy, 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's business in the UK or any company within the Telstra Group incorporated in the 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.

United States of America

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.



Appendix 1 – NAVEX Global – EthicsPoints contact details

- Internet site for online reporting and general information: <http://telstra.ethicspoint.com/>
- Telephone contact details below:

Country	Telephone Number		At the English prompt dial...
Australia	1-800-875-314		N/A
France	8447414244		N/A
India	00-800-040-1331		N/A
United States	844-439-4697		N/A
Germany	0-800-225-5288		844-439-4697
Hong Kong	800-93-2266		844-439-4697
	800-96-1111		
Indonesia	001-801-10 1. Not available from cellular phones 2. Use public phones allowing international access		844-439-4697
Japan	Japan (NTT)	0034-811-001	844-439-4697
	Japan (KDDI)	00-539-111	
	Japan (Softback Telecom)	00-663-5111	
Korea	Korea (Dacom)	00-309-11	844-439-4697
	Korea (ONSE)	00-369-11	
	Korea (Korea Telecom)	00-729-11	
	Korea (U.S. Military Bases – Dacom)	550-2872	
	Korea (U.S. Military Based – Korea Telecom)	550-4663	
Malaysia	1-800-80-0011		844-439-4697

Effective Date: 3 December 2025
Policy Owner: HR Executive Director
Approval: PGC

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Country	Telephone Number		At the English prompt dial...
Netherlands	0800-022-9111		844-439-4697
Philippines	Philippines (PLDT – Tagalog Operator)	1010-5511-00	844-439-4697
	Philippines (Globe, Philcom, Smart)	105-11	
Singapore	Singapore (StarHub)	800-001-0001	844-439-4697
	Singapore (SingTel)	800-011-1111	
South Africa	0-800-99-0123		844-439-4697
Sweden	020-799-111		844-439-4697
Taiwan	00-801-102-880		844-439-4697
Thailand	001-999-111-11 1-800-0001-33		844-439-4697
UAE	United Arab Emirates	8000-021	844-439-4697
	United Arab Emirates (du)	8000-555-66	
	United Arab Emirates (Military-USO and cellular)	8000-061	
UK & N. Ireland	United Kingdom (C&W)	0-500-89-0011	
	United Kingdom (British Telecom)	0-800-89-0011	
China	4006002510		N/A

References

Document Number	Title
1	WB Policy

Effective Date: 3 December 2025
Policy Owner: HR Executive Director
Approval: PGC

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Attachments

Document Number	Title
n/a	n/a

Document control sheet

Who to reach out to if you have any queries, questions, changes or concerns.

Name	Enter contact name here
Name	Monica Lillas, Natalie McKinley and Kate Houghton
Email	Monica.Lillas@team.telstra.com / Natalie.McKinley@team.telstra.com / Kate.Houghton@team.telstra.com

If you have a suggestion for improving this document, please contact the person listed above.

Issue number	Issue date	Details on the change
V12	2025	Review – minor amendments to incorporate Fiji in the schedule
V12	2024	Review – minor amendments

Effective Date: 3 December 2025
Policy Owner: HR Executive Director
Approval: PGC

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