



Whistleblower Policy

March 2024

Version 10

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Overview

Policy owner	The Senior Manager, Enterprise Compliance – Financial Crime is responsible for reviewing this Policy and recommending any changes for approval.	
Breach reporting	Please report concerns about possible or actual breaches of this Policy to the Whistleblowing Investigation Officer. Refer to Section 4 for details.	
Application	<p>This Policy applies to Aware Super Pty Ltd (Trustee), being the Trustee of Aware Super (Fund) and each of its wholly owned Australian operating companies being:</p> <ul style="list-style-type: none"> • Aware Financial Services Australia Ltd (AFSAL); • Aware Super Services Pty Ltd; and • Aware Super Legal Pty Ltd. <p>References to 'Aware Super' throughout this document refer to each of these companies collectively unless the context necessitates otherwise.</p> <p>All Group Personnel of Aware Super are required to comply with this policy.</p>	
Review	<p>This Policy is subject to review and approval by the following bodies for continuing suitability, in the following order:</p> <ol style="list-style-type: none"> 1. Audit, Risk and Compliance Committee (ARCC approval) 2. Aware Financial Services Australia Ltd Board (AFSAL Board approval) <p>A full revision history of this Policy is contained in Section 9.</p>	
	Review Frequency	2 years
	Date of last review	February 2024
	Date of next review	February 2026
Approvals	Changes to this policy must be approved by the ARCC and the AFSAL Board.	
Related Internal documents	<p>This Policy should be read in conjunction with the following:</p> <ul style="list-style-type: none"> • Code of Conduct • Director Code of Conduct and Ethics • Conflicts Management Policy • Employee Grievance and Complaints Policy • Fraud Policy • Privacy Policy • Workplace Behaviour Policy • Incident and Breach Management Policy 	
Version	10	
Classification	Public	

1 Introduction

Aware Super is committed to conducting business with integrity and honesty. We encourage a culture of speaking up about any concerning issues from illegal conduct to behaviour that isn't in line with our values or code of conduct. This enables us to reinforce a consistent culture of proactive risk management and strong corporate governance that our people, members and regulators can rely upon.

This Policy outlines the processes and protections available for people to safely report any wrongdoing or misconduct without fear of punishment or unfair treatment.

1.1 Purpose

The purpose of this Policy is:

- to encourage disclosures of wrongdoing;
- to ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- to ensure disclosures are dealt with appropriately and on a timely basis; and
- to provide transparency around Aware Super's framework for receiving, handling and investigating disclosures.

1.2 Policy Application and Access

This Policy applies to all Group Personnel and to the Eligible Whistleblowers covered under Section 2.2. This policy does not apply to member complaints or concerns about Aware Super, its staff or contractors, as they handled through our complaints and internal reporting channels.

This Policy is accessible through the following channels:

- Internal: Aware Super's Intranet - Key Business Policies and Procedures Page
- External: www.aware.com.au

1.3 Legislation and regulation

This Policy incorporates the Whistleblower protections and best practice guidance set out in:

- Corporations Act 2001 (Cth), Part 9.4AAA;
- Tax Administration Act 1953; and
- ASIC Regulatory Guide 270 - Whistleblower Policies

2 Whistleblower Disclosures

2.1 What matters can be disclosed?

Reasonable Grounds

To disclose a matter under Applicable Law, a Discloser must have reasonable grounds to suspect that there has been misconduct or an improper state of affairs or circumstances, in relation to Aware Super. Actual contravention of law is not required for a matter to be considered as a **Disclosable Matter** as long as the Discloser had reasonable grounds to suspect misconduct.

Examples of Disclosable Matters include:

- illegal conduct such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- fraud, money laundering or misappropriation of funds;
- corruption - offering or accepting a bribe;
- misconduct or an improper state of affairs in relation to Aware Super's activities including Aware's tax affairs;
- dishonest activity or wrongdoing that impacts Aware Super, or its members
- unethical behaviour or wrongdoing, including breaches of internal policies;
- failure to comply with, or breach of, legal or regulatory requirements;
- 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.
- conduct that represents a danger (injury, loss or damage) to the public or financial system;
- conduct involving substantial risk to the environment or company's reputation or value;
- intimidation or harassment; and
- ostracism, discrimination, disadvantage or adverse treatment coercion, and
- manipulation, including threats or inducements offered to compel someone affiliated with Aware Super to perform any acts listed above.

Disclosable Matters generally do not include reports of misconduct solely related personal work-related grievances. These types of concerns do not qualify for protection under the Applicable Law but may be protected under other legislation, including Employment Law¹.

2.2 Who can make a Report (or Disclosure)?

A person, also known as an 'eligible whistleblower', that has reported under this Policy who qualifies for protection under the Applicable Law. This can be any of the following **eligible recipients** (current or former) with respect to Aware Super:

- Officers (e.g., directors, company secretary);
- Employees and temporary staff (including contractors and secondees);
- Service providers or their employees (e.g., auditors, accountants, consultants);
- Trustee, custodians and investment managers, including their officers or employees;
- Supplier or employee of a supplier; or
- A relative (spouse, dependent or child) of any individual in the above groups.

2.2.1 Can I report anonymously?

The Discloser may choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A Discloser may also refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

Protections under Applicable Law will remain even if the Whistleblower chooses to be anonymous. However, it should be noted that this may limit Aware Super's ability to investigate the matter properly and efficiently. In such instances, it is advised that the Whistleblower maintain an ongoing two-way communication with Aware Super or such other external reporting channel, so that follow-up questions can be asked, or feedback provided.

¹ Fair Work Act 2009

2.3 To whom and how can a report be made?

To qualify for legal protections, the report must be made directly to an '**eligible recipient**' (as detailed above). These are roles that are specifically responsible for receiving disclosures. They can be internal or external to Aware Super. Reports can be made to the eligible recipient by using methods including (but not limited to) face-to-face discussion, written letter, telephone call or email.

If a report comes from an email address from which the person's identity cannot be determined, and the Discloser does not identify themselves in the email, it will be treated as an anonymous disclosure.

The Discloser may also adopt a pseudonym in circumstances where they are known to their eligible recipient, but prefers not to disclose their identity to others.

While not a requirement, Aware Super encourages Group Personnel to first raise their concerns internally to enable Aware Super to identify and address wrongdoing as early as possible.

2.3.1 Whistleblowing - Internal Reporting Avenues

Eligible Recipient	Contact Information
Whistleblower Protection Officer	Group Executive, People and Workplace (e) steve.hill@aware.com.au
Whistleblower Investigation Officer	Chief Risk Officer (e) Jane.Couchman@aware.com.au
Board of Directors	for a current list of Directors click here
Executive Leadership team	for a current list of Executives click here
Internal Auditor	Ernst & Young (t) +61 2 9248 5555 (w) www.ey.com/en_gl (m) 200 George Street, Sydney NSW 2000
External Auditor	Deloitte Touché Tohmatsu (t) +61 2 9322 7000 (w) www.deloitte.com.au (m) Grosvenor Place, 225 George Street Sydney, NSW 2000
Actuaries	Mercer Administration Services (Australia) Pty Limited (t) +61 2 8864 6800 (w) www.mercer.com.au (m) 100 Barangaroo Ave, Barangaroo NSW 2000

2.3.2 Whistleblowing - External Reporting Avenues

Eligible Recipient	Information
Deloitte Whistleblower Service (HALO)	The Deloitte Whistleblower Service is an independent, free service. A report does not need to be raised internally before accessing this facility. All interactions with Deloitte are confidential and can be made anonymously if desired. Deloitte will record

(Available 24*7)	<p>information that is disclosed and forward the matter to Aware Super for investigation. Unless the Discloser consents, information on the Discloser's identity will not be forwarded to Aware Super.</p> <p>(t) 1800 173 918 (e) Whistleblower@deloitte.com.au (f) +61 3 9691 8182 (w) www.awareWhistleblower.deloitte.com.au (m) Deloitte Whistleblower Service, Reply Paid 12628, A'Beckett Street, Melbourne VIC 8006</p>
Regulators	<p>A report can also be made directly to one of Aware Super's regulators such as:</p> <ul style="list-style-type: none"> • ASIC using the online misconduct reporting form available on their website; • APRA by contacting an authorised officer by email: whistleblower@apra.gov.au or posting the disclosure marked 'Confidential' to: <ul style="list-style-type: none"> ◦ General Counsel APRA GPO Box 9836, Sydney NSW 2001 • other prescribed Commonwealth authorities, such as the ATO (for matters relating to taxation) by completing the tip-off form on their website.
Public Interest Disclosures	<p>A public interest disclosure can be made to a journalist or a member of Parliament, if:</p> <ul style="list-style-type: none"> • at least 90 days have passed since the previous disclosure was made to ASIC/APRA or other authority; • the Discloser has reasonable grounds to believe the disclosure is in the public interest; • the Discloser has no reasonable grounds to believe that action is being taken or has been taken to address the disclosed matter; and • the Discloser has given ASIC/APRA or other authority a written notice that includes sufficient information to identify their earlier report and states their intention to make a public interest disclosure.
Emergency Disclosures	<p>An emergency disclosure can be made to a journalist or a member of Parliament, provided that:</p> <ul style="list-style-type: none"> • The Discloser has previously made a report to ASIC or APRA; • The Discloser has reasonable grounds to believe that their report concerns substantial and imminent danger to the health or safety of one or more people or the environment; • The Discloser gives ASIC or APRA written notice that includes sufficient information to identify the earlier report and states their intention to make an emergency disclosure; • The Discloser reports their concerns about the substantial or imminent danger to a journalist or parliamentarian, noting that the extent of the information disclosed must be no greater than is necessary to inform the recipient about the substantial and imminent danger.

Note: ASIC recommends Disclosers contact an independent legal adviser before making a public interest or emergency disclosure. Any disclosures made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the Whistleblower provisions are legally protected.

2.3.3 Other Reporting channels for concerns that are not covered by this policy:

Aware Super encourages the reporting of suspected or actual wrongdoing and fosters a culture of feeling safe to speak up. Before making a wrongdoing disclosure under this Policy, Group Personnel should consider if it is more appropriate to report the matter to their line manager, their manager's manager or via the usual internal support

channels such as the People and Workplace and Risk and Compliance teams. In many cases (i.e., individual workplace related grievances and non-serious instances of suspected or actual wrongdoing), reporting via the usual channels should lead to the concern being satisfactorily addressed.

However, Whistleblowing reports may be made where:

- The usual internal channels are not appropriate;
- There are concerns about victimisation / reprisals;
- There is a preference to make a report anonymously.

2.4 What information should be reported?

A Whistleblower should include as much information as possible about the incident or action, including but not limited to:

- Aware Super's name (if reporting to the Deloitte Whistleblower Service);
- name(s) of people involved;
- name(s) of any possible witnesses to the events;
- date, time and location of the misconduct; and
- any other details of the incident or action, evidence of events (e.g., documents or emails) including information about financial or non-financial loss and whether it has occurred on other occasions.

2.5 Handling and Investigating a report

2.5.1 Handling a report

On receipt of a report, Aware Super will ensure it follows a fair independent process that is conducted in a timely manner by:

- determining if the disclosure qualifies for protection; and
- ensuring that persons tasked with reviewing the disclosure are independent from the area relating to the reported matter.

All reports that qualify for protection are forwarded to the Whistleblower Investigation Officer (WIO), who will perform an initial assessment, and determine whether the matter should be investigated or not. If the disclosure is assessed as not being qualified for protection or not investigated (for example, if previously the report was investigated and no new changes have been disclosed), the Discloser will be informed, if they can be contacted.

2.5.2 Investigating a report and ongoing communication

If the WIO decides that the disclosure will be investigated, an investigation will be conducted with the support of internal or external resources as appropriate. Any investigation will be conducted in a fair manner and as quickly as the circumstances allow.

The Whistleblower will be informed of the progress of the investigation during the key stages, if they can be contacted, subject to privacy and confidentiality considerations. All Whistleblowers should maintain confidentiality of all such reports and must not disclose details to any person.

In situations where Aware enters into any settlement with the Whistleblower(s), the terms of any confidentiality provisions will not attempt to limit the Whistleblower's ability to voluntarily raise any potential disclosable matters with a relevant regulator.

Once the investigation ends, the Whistleblower will be notified and informed of the outcome, where appropriate. There may be circumstances where it is not appropriate for Aware Super to provide details of the investigation,

however will endeavour to provide as much information as possible and ensure that the disclosure has been investigated in accordance with this Policy.

A further review can be requested if the discloser is not satisfied with the outcome of investigation. The WIO will determine whether there is a sufficient basis to reopen the investigation. Disclosers can also lodge a complaint with the relevant regulatory body.

To understand the steps that we will take to investigate a disclosure refer to [Appendix 2](#).

2.6 Ensuring fair treatment of individuals mentioned in a report

Aware Super will ensure the fair treatment of its Group Personnel who are mentioned in a Whistleblower report that qualifies for protection, including those who are subject of a disclosure. Some of the measures to achieve this include:

- disclosures with respect to the individuals mentioned in the report will be handled confidentially when it is practical and appropriate in the circumstances;
- each disclosure will be assessed and may be the subject of an investigation;
- the objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported; and
- when an investigation needs to be undertaken, the process will be objective, fair and independent;
- an employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken—for example, if the disclosure will be the subject of an investigation;
- an employee who is the subject of a disclosure may contact the Aware Super's support services i.e., Employee Assistance Programme (EAP) which can be contacted on 1300 687 327 .

3 Whistleblower Legal Protections

In order to qualify for the Whistleblower protections under applicable law, a disclosure or report

- must be concerning a '**disclosable matter**' reported directly to an '**eligible recipient**' as indicated in [Section 2](#) above;
- is made to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions; or
- is made as an 'emergency disclosure' or 'public interest disclosure'.

A Whistleblower may qualify for protection even if their disclosure turns out to be incorrect. Whistleblowers will be eligible for the protections if they have reasonable grounds to suspect the concerns they disclose.

3.1 Whistleblower Legal Protections

3.1.1 Whistleblower identity protection

The Whistleblower's identity (or any information that would likely identify the Whistleblower) will not be shared with anyone except in the following circumstances:

- the disclosure is otherwise permitted or required by law (e.g.to ASIC, APRA or the AFP);
- to a person or body prescribed by regulations
- it is made to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of Whistleblower Laws; or

- with the consent of the Whistleblower.

Information contained in a disclosure can be disclosed with or without the Whistleblower's consent if:

- the information does not include the Whistleblower's identity;
- Aware Super has taken all reasonable steps to reduce the risk that the Whistleblower will be identified from the information; and
- it is reasonably necessary for investigating the issues raised in the disclosure.

It is illegal for a person to identify a Whistleblower or disclose information that is likely to lead to the identification of the Whistleblower, outside the exceptions listed above. A Whistleblower may lodge a complaint with Aware Super about a breach of confidentiality or with a regulator, such as ASIC, APRA or the ATO, for investigation.

3.1.2 Protection from detrimental acts or omissions

It is unlawful for a person to engage or threaten to engage in conduct that causes or detriment to a Whistleblower (or another person), in relation to a disclosure if

- they believe or suspect that the Discloser (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection and
- this belief or suspicion is the reason, or part of the reason, for their conduct.

Detrimental Conduct includes the following:

- dismissal, suspension, demotion or being overlooked for future promotions or career opportunities;
- any form of harassment, discrimination, bullying, intimidation or threatening behaviour;
- not giving employees their legal entitlements or providing different or unfair terms and conditions for their job;
- harm or injury to a person, including psychological harm;
- damage to a person's property, reputation, business or financial position or any other damage;
- any other conduct that constitutes victimisation

Detrimental conduct does not include reasonable administrative actions such as:

- moving a Discloser's work area to another office to protect them from detriment; or
- managing a Discloser's unsatisfactory work performance, if it is in line with the usual performance management process.

3.1.3 Protections provided in the Tax Whistleblower Regime

A Discloser is also protected under Part IVD of the *Taxation Administration Act 1953* if they make disclosures to the Tax Commissioner in relation to Aware Super not complying with tax laws.

3.1.4 Other legal protections

Following are the other legal protections that the Whistleblower may rely on:

- **Compensation and other remedies:** A Whistleblower can seek compensation² and other remedies through court, if:
 - they suffer loss, damage or injury because of a disclosure; and
 - Aware Super failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.
- **Civil, criminal and administrative liability protection:** A Whistleblower is protected from any of the following in relation to their disclosure:
 - civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
 - criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure)); and
 - administrative liability (e.g. disciplinary action for making the disclosure).

The protections do not grant immunity for any misconduct a Whistleblower has engaged in, that is revealed in their disclosure.

3.2 Whistleblower Support and Practical Protections

Anyone covered by this Policy may approach, or seek advice and further information from, the Whistleblower Protection Officer (WPO) before, during, or after making a report confidentially.

3.2.1 Measures for protecting Whistleblower's identity and maintain confidentiality

On receipt of a report the WPO will conduct a risk assessment (refer [Appendix 1](#) Glossary) to help identify what protections need to be put in place to protect the person's identity. Some of these protections include:

- Their right to anonymity and to not identify themselves at any time during the investigation process.
- Deloitte Whistleblowing platform that help protect the person's identity after submitting a report.
- All personal information or reference to the Whistleblower witnessing an event will be redacted.
- The Whistleblower will be referred to in a gender-neutral context.
- Disclosures/reports will be handled and investigated by qualified staff.
- Their right to refuse to answer questions if they feel this could reveal their identity.
- If they reveal their identity at any time, documenting who will have access to their identity.
- Reminding those involved in the investigation of their obligations to maintain confidentiality at all times.
- Secure record keeping and information-sharing process:
 - all paper and electronic documents and other materials relating to disclosures are stored securely;
 - access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
 - only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the Discloser.
 - communications and documents relating to the investigation of a disclosure will not to be sent to an email address or to a printer that can be accessed by other staff; and

² It is encouraged that the Whistleblower seeks independent legal advice in these matters.

- each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

3.2.2 Measures for protecting Whistleblowers from detriment

The protections offered will be determined by the WPO following consultation with the Whistleblower and will depend on things such as the alleged misconduct and people involved. Some of these protections may include the following (measures will be taken as the WPO may deem necessary):

- monitoring and managing the behaviour of other employees;
- relocating employees to a different division, group or office or revising the reporting lines of employees;
- offering a leave of absence or flexible workplace arrangements while a matter is investigated; and
- rectifying any detriment suffered.

If the Whistleblower is concerned that they may be, are being, or have been subject to adverse action (including threats or concern of potential detrimental action) as a result of making a report, it should be reported immediately to the WPO, so it can be confidentially and swiftly investigated and addressed.

Any person who engages in taking adverse action may be subject to disciplinary action (including but not limited to termination of employment or engagement). In some circumstances, this may also be a criminal offence punishable by imprisonment and we may refer the matter to law enforcement authorities for investigation.

For more detailed information on the steps, Aware Super will take to protect Whistleblowers and their legal protections under Applicable Law refer to [Section 3.1](#).

3.2.3 Mechanisms to support Whistleblowers

On receipt of a report, the WPO will consider what support we can offer the Whistleblower. This is the case, even if they have chosen to remain anonymous, however our ability to provide support will be greater if we know who they are.

A Whistleblower who is a current or former employee may access Aware Super's Employee Assistance Programme (EAP) which can be contacted on 1300 687 327.

Aware Super will look for ways to support all Whistleblowers, but we may not be able to provide non-employees with the same type and level of support that we can provide to employees. In such cases, we will still seek to offer as much support as practicable.

4 Breaches of this Policy

4.1 Consequences for breaching this Policy

If a Group Personnel is found to have breached the provisions of this Policy, they:

- may be subject to disciplinary action which may include the termination of their employment or engagement; and
- may be guilty of an offence that is subject to prosecution under legislation.

A Whistleblower who believes he or she, or his or her family, have been subjected to reprisals or retaliation by reason of their status as a Whistleblower, should immediately report the matter to the WPO.

A Whistleblower who has been involved in improper conduct may, at our discretion, be provided with immunity from Aware Super's initiated disciplinary action unless their report is proven to be malicious or as otherwise required by law. However, we have no power to provide immunity from criminal liability.

5 Roles and Responsibilities

Responsible party	Description of role & responsibility under this policy
Whistleblowing Investigation Officer (WIO)	<ul style="list-style-type: none"> Acts independently and is responsible for conducting preliminary investigations into any report received from a Whistleblower. The WIO is the Chief Risk Officer (CRO), or in the CRO's absence, their delegate. The WIO may delegate the investigation as deemed appropriate based on the circumstances where there would be a requirement to involve other stakeholders such as subject matter experts.
Whistleblower Protection Officer (WPO)	<ul style="list-style-type: none"> The WPO is the person who is responsible for protecting Whistleblowers in accordance with this Policy and the applicable legislation. The WPO is independent of the investigation and is there to ensure that the Whistleblower's rights are protected, and he/she receives the support they need during and after the investigation. The WPO will have access to independent financial, legal and operational advisers as required. For the purposes of this Policy, the WPO is the Group Executive, People and Workplace or in their absence, their delegate. The WPO may delegate the investigation as deemed appropriate based on the circumstances.
Whistleblower Investigation facilitator	<ul style="list-style-type: none"> When a report is received, the Senior Manager, Enterprise Compliance – Financial Crime or in their absence, their delegate is responsible for: <ul style="list-style-type: none"> Organising meetings with the WIO and WPO Provide Subject Matter Expertise Support with tools/templates for investigation Prepare reporting Maintains secured central repository for recording of Whistleblower Disclosures
Group Personnel	<ul style="list-style-type: none"> Responsible for ensuring they understand the Whistleblower Policy and the consequences of non-compliance with the Policy. Obligated to respect confidentiality involved in an investigation. Prohibited from attempting to discover the identity of any Whistleblower, who has chosen to report a concern anonymously. Speak up if they have any concerns.
Enterprise Compliance	<ul style="list-style-type: none"> Develop, and maintain the Whistleblower Policy and relevant tools/templates in line with regulatory requirements. Provide training and guidance on implementation of the Policy. Oversee the monitoring and compliance with the Whistleblowing Policy.

Responsible party	Description of role & responsibility under this policy
General Counsel	<ul style="list-style-type: none"> Provides input into the disclosure assessment, investigation, and outcome. Undertakes or participates in investigations as directed by the WIO.

5.1 Delegations and Independence

The WIO and WPO act independently in their roles and are responsible for any Whistleblower investigations and Whistleblower protection respectively.

Notwithstanding the responsibilities set out above, if any matters reported could be a perceived or are an actual conflict of interest for the WIO, WPO or the Whistleblower Investigation facilitator, they must appoint a delegate.

Delegates should be:

- independent of either the WIO or the WPO
- independent from the investigation
- independent of each other; and
- independent of the allegations made in the report.

If necessary, external investigation services may be utilised in investigating the matter in order to manage the conflict of interest.

6 Notification, Monitoring and Reporting

6.1 Whistleblower Protection Officer

If the Whistleblower has identified themselves, the WIO will inform the WPO as soon as they receive a Whistleblower Report. The WPO also receives notification of a Whistleblowing Report made via the external Whistleblower Service.

6.2 Board Chair and Chief Executive Officer

The WIO will notify the Chair of the relevant Board and the Chief Executive Officer (CEO) within 5 working days of a Whistleblower Report being received. The WIO will also notify the Chair of the relevant Board and the CEO on the outcomes of the investigation. Anonymity and confidentiality will be maintained.

6.3 Boards and Committees

Ensuring that the identity of the Whistleblower will not be revealed, the WIO will report the following information on a quarterly basis as part of the Group Executive, Risk and Compliance Report to the Aware Super and/or AFSAL Boards and the Audit, Risk and Compliance Committee:

- The nature of the report e.g., misconduct and/or any other reportable matter;
- The affected business unit(s);
- The type of person who made the disclosure;
- The status of the whistleblower report;
- Whistleblower reporting channel used;
- Date the whistleblower report was made;
- Date that the investigation concluded;

- The action taken for each disclosure; and
- The outcome of each disclosure.

6.4 Monitoring

The effectiveness of the Whistleblower Policy is monitored through the Enterprise Compliance's Assurance Review Program, where the relevant regulatory obligations are assessed to ensure they are being managed effectively.

6.5 Regulators

A report will also be made to ASIC or APRA, where it is determined that a reportable breach has occurred in accordance with Aware Super's Incident and Breach Management Policy.

7 Training and Awareness

This Policy training is communicated to all new Group Personnel as part of our induction program. Mandatory Whistleblower Policy training is made available to all Group Personnel which is required to be completed on an annual basis.

Specialist training is also provided to internal eligible recipients, on an annual basis.

8 Document Retention

All information, documents, records and reports relating to the investigation of improper action will be securely stored and retained in an appropriate and confidential manner for disclosures made through internal and external reporting channels.

9 Review

At a minimum, this Policy is subject to review every **two years**, it will occur sooner if one of the following events arise:

- legislative changes or rulings by a Regulator require a review of the Policy;
- the Policy is no longer appropriate; or
- there are reasons to believe that this Policy has failed, or may fail, to support the compliance and/or operational obligations of our organisation and stem misconduct risk.

9.1 Revision history

Set out the full revision history of the policy here.

Version	Reason for amendment	Date approved	Approving Committee/Board
1	Review	May 2014	ARCC

2	Review – pending	May 2017	ARCC
3	Review	November 2018	ARCC
4	Review – Enhancing Whistleblower Protection Bill 2017	April 2019	ARCC
5	Updates – Treasury Laws Amendment (Enhancing Whistleblower Protection) Act 2019	June 2019	ARCC
6	Removal of reference and usage of the whistleblowing reporting channel via ERIC Update of reporting to Board and Audit, Risk and Compliance Committee. Extend coverage to all First State Super Services Employees	November 2019	ARCC
7	Clarification of personal grievance provisions Detailing steps to provide protection of Whistleblowers, including their identity. Insertion of Investigation process. Attachment of consent form	February 2020	ARCC
		March 2020	StatePlus Board
8	Updated to reflect Aware Super Branding Confirm coverage of Vic Super	September 2020	ARCC
		September 2020	AFSAL Board
9	Inclusion of usual reporting channels Clarification of Whistleblower reports relating to direct assets Clearly set out Whistleblower’s legal protections	February 2022	ARCC
		March 2022	AFSAL Board
10	<ul style="list-style-type: none"> Clarification of roles and responsibilities and related delegations Updated Policy access channels Updated the series of topics and content to make it clearer while aligning to RG 270 Included information on Protections available in the Tax Whistleblower Regime Included the consideration for reasonable grounds while reporting a matter by Discloser Updated the Eligible recipients contact information Added a new section on how Aware Super monitors the Policy effectiveness Removed duplicated content and aligned the language throughout with regards to Whistleblowers referencing to be consistent while aligning to RG 270 Updated Glossary to include definitions of ‘Risk Assessment’, ‘Discloser’, and ‘Whistleblower’. 	February 2024	ARCC
		March 2024	AFSAL Board

Appendix 1: Glossary

Term	Definition
Applicable Law	As defined in Section 1.3 .
Detrimental conduct	Any actual or threatened conduct that could cause a detriment to the Whistleblower as a result of making the disclosure. See Section 3.1.2 for examples of what constitutes detrimental conduct.
Discloser	An individual who discloses or reports a wrongdoing.
Group Personnel	All employees, contractors, directors and Responsible Persons of the Group are referred to as Group Personnel.
Personal work-related grievances	<p>Personal work-related grievances include:</p> <ul style="list-style-type: none"> • an interpersonal conflict between employees; • a decision that does not involve a breach of workplace laws; • a decision relating to employment, transfer or promotion; • a decision about the terms and conditions of employment, such as remuneration; or • a decision to suspend or terminate a staff member's employment, or otherwise to discipline them.
Risk & Compliance Team	The risk and compliance team is the reporting channel for concerns related to financial crime, fraud and/or compliance. The reporting can be made via the GRC system, which is governed in accordance with the Incident and Breach Management Policy.
Risk Assessment	<p>Steps in assessing and controlling the risk of detriment:</p> <ul style="list-style-type: none"> • Risk identification: Assessing whether anyone may have a motive to cause detriment—information could be gathered from a discloser about: <ul style="list-style-type: none"> ○ the risk of their identity becoming known; ○ who they fear might cause detriment to them; ○ whether there are any existing conflicts or problems in the workplace; and ○ whether there have already been threats to cause detriment. • Risk analysis and evaluation: Analysing and evaluating the likelihood of each risk and evaluating the severity of the consequences. • Risk control: Developing and implementing strategies to prevent or contain the risks—for anonymous disclosures, it may be worthwhile assessing whether the discloser's identity can be readily identified or may become apparent during an investigation. • Risk monitoring: Monitoring and reassessing the risk of detriment where required—the risk of detriment may increase or change as an investigation progresses, and even after an investigation is finalised
Whistleblower	A Discloser who has made a disclosure that qualifies for protection under the Corporations Act.

Appendix 2: Investigation Process

