

What you need to know

- AMP has adopted this policy to encourage our staff and external partners to speak up, without fear, in raising any concerns they have regarding disclosable matters as defined in this policy.
- You are encouraged to report any concerns regarding disclosable matters to AMP by contacting the Whistleblowing Program (who can be emailed via whistleblowing@amp.com.au) or through our external and independent provider Your Call. Your Call has been contracted by AMP to receive reports impartially and confidentially. Your Call can be contacted via:
 - Phone: 1300 790 228 (Australia), 0800 123 508 (New Zealand) or +61 3 9895 0012 (Intl);
 - Email to amp@yourcall.com.au;
 - Online at yourcall.com.au/report using AMP1849 as the organisation ID;
 - Mail to Locked Mail Bag 7777, Malvern VIC 3144 Australia;
 - If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or New Zealand Relay. Simply choose your contact method at relayservice.gov.au or nzrelay.co.nz and request Your Call's hotline 1300 790 228.

Overview	The Whistleblowing Policy sets out AMP's approach to encourage and support the reporting of disclosable matters and to protect whistleblowers from any detriment that may arise as a result of raising a concern
Objective	To encourage and support the reporting of disclosable matters by providing assurance to whistleblowers that it is safe for them to do so
Scope	This policy applies to current and former officers, employees, contractors, consultants, suppliers (including their employees), third party providers, secondees and associates of AMP (including a relative, spouse or dependant of one of the foregoing people, or a dependant of their spouse) of AMP
Policy owner	Group Chief Risk Officer
Policy approver	AMP Limited Board Audit Committee and AMP Bank Board Audit Committee
Effective date	January 2022
Review date	January 2024

1. What is the purpose of this policy?

AMP (which in this policy includes AMP Limited, members of the AMP Group which are majority owned by AMP Limited or its subsidiaries, as well AMP superannuation entities and their trustees) is committed to conducting its business honestly, with integrity, and in accordance with its values and standards of expected behaviour as detailed in our Code of Conduct.

This policy has been developed in accordance with the ASIC's Regulatory Guide 270 and the requirements of the *Corporations Act 2001* to encourage our staff and external partners to speak up without fear in raising concerns about disclosable matters. It sets out how to raise a concern about disclosable matters, what protections apply in those circumstances, and the processes at AMP for responding to reports about disclosable matters.

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

AMP operates in multiple countries and is subject to applicable local laws. If any local laws are in any way inconsistent with this policy or impose a higher level of protection than this policy, those local laws take precedence to the extent of the inconsistency.

2. When will this policy apply?

This policy will apply when a whistleblower makes a disclosure in accordance with the requirements under the whistleblower protections of the *Corporations Act 2001* (Cth) (**Corporations Act**).

Whistleblowing protection is afforded when:

- an eligible whistleblower;
- makes a disclosure of information relating to a "disclosable matter";
- to an eligible recipient.

3. Who is an eligible whistleblower?

An eligible whistleblower includes current and past:

- employees of AMP;
- officers of AMP;
- individuals who supply services or goods to AMP (whether paid or unpaid);
- employees of a person who supplies services or goods to AMP (whether paid or unpaid);
- an employee or officer of a body corporate that is a trustee of an AMP superannuation entity (Trustee), an individual or employee of a body corporate who supplies services or goods to such a Trustee, or a custodian or investment manager (including their employees and officers) in relation to such a Trustee;
- associates of AMP (for example, a director or secretary of AMP or a related company of AMP); and
- relatives, spouses or dependants of any of the people listed above (or a dependant of their spouse).

If you are a customer and are concerned with the way AMP has handled any matter, product or service, including an existing complaint, this policy and the whistleblower protections under the Corporations Act do not apply to you (unless you are separately an eligible whistleblower as set out above), but AMP are keen to understand such concerns. Instead, please contact customer service.

4. What is a disclosable matter?

The types of matters that qualify for protection under the Corporations Act (ie disclosable matters) involve information that a whistleblower has reasonable grounds to suspect concerns:

- misconduct or an improper state of affairs or circumstances in relation to AMP, or a related body corporate of AMP;

- offences by AMP, or a related body corporate of AMP (including their employees or officers) against, or a contravention of, a provision of any of the following:
 - i. the Corporations Act;
 - ii. the *Banking Act 1959*;
 - iii. the *Financial Sector (Collection of Data) Act 2001*;
 - iv. the *Insurance Act 1973*;
 - v. the *Life Insurance Act 1995*;
 - vi. the *National Consumer Credit Protection Act 2009*;
 - vii. the *Superannuation Industry (Supervision) Act 1993*;
 - viii. an instrument made under an Act referred to in any of subparagraphs (i) to (viii); or
 - ix. any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- conduct by AMP, or a related body corporate of AMP (including their employees or officers) that represents a danger to the public or the financial system; or
- a matter otherwise prescribed by regulation.

Disclosures that are not about 'disclosable matters' (as set out above and defined in the Corporations Act) do not qualify for protection under the Corporations Act. However, such disclosures may be protected under other legislation, such as the *Fair Work Act 2009* (Cth).

At AMP, the types of matters that qualify as 'disclosable matters' under this policy may include:

- bribery, corruption, financial fraud or malpractice, WHS breaches or insider trading;
- some serious breaches of AMP's Code of Conduct;
- a failure to comply with, or breach of, legal or regulatory requirements;
- negligence, default, breach of trust and breach of duty;
- systemic issues concerning AMP;
- financial irregularities, money laundering or misappropriation of funds;
- illegal conduct such as theft, dealing in or use of illicit drugs, violence or threatened violence, and criminal damage against property; or
- 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.

We encourage you to raise your concerns, even if it relates to something you only reasonably suspect is occurring. You do not have to be sure that conduct that is the subject of the disclosable matter has occurred in order to raise a concern, but you must have reasonable grounds to suspect AMP, a related body corporate of AMP, or any of their employees or officers, has engaged in the relevant conduct that is the subject of the disclosable matter.

You can also make a protected disclosure to a lawyer where you seek legal advice or legal representation in relation to the operation of the whistleblower laws under the Corporations Act (or the Tax Administration Act where applicable), even if this does not relate to a disclosable matter.

Disclosable matters do not include 'personal work-related grievances', which should instead be raised in accordance with the Complaints Handling Policy for Workers or equivalent for those not based in Australia or New Zealand to allow those issues to be resolved most effectively.

'Personal work-related grievances' are:

Personal work-related grievances

Grievances relating to a person's current or former employment or engagement that have implications for them personally (that is, they relate solely to them), and do not fall within the scope of a disclosable matter that qualifies for protection under the Corporations Act.

For example, an interpersonal conflict between the person and another employee, or a decision relating to their employment or engagement, such as a transfer, promotion or disciplinary action or the terms and conditions of their employment, that does not involve breach of workplace laws would be a 'personal work-related grievance'.

However, if a person has raised a personal work-related grievance that has significant implications for AMP, includes information about a disclosable matter or misconduct beyond a person's personal circumstances (e.g. relating to AMP or other individuals), or relates to detriment they have suffered or have been threatened with because they have raised a concern about a disclosable matter, then that grievance may still qualify for protection and be covered by this policy.

You will not be penalised if a concern raised by you ultimately turns out to be incorrect, if your disclosure was made with a genuine belief regarding a disclosable matter. However, you must not make a report that you know is not true or is misleading. Where it is found that a whistleblower has knowingly made a false report, this will be considered a serious matter and may result in disciplinary action.

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

To be afforded whistleblower protection under both this policy and the Corporations Act, you must disclose your concerns about disclosable matters to an eligible recipient. The role of an eligible recipients is to receive disclosures that qualify for protection.

Eligible recipients at AMP include:

- the Group Whistleblowing Officer, or persons authorised by them;
- Group Executives and their Direct reports;
- internal and external AMP auditors and/or actuaries;
- a director or officer of AMP and/or its related body corporates;
- through Your Call, an external and independent provider contracted by AMP to receive reports impartially and confidentially. Your Call can be contacted via:
 - Phone: 1300 790 228 (Australia), 0800 123 508 (New Zealand) or +61 3 9895 0012 (worldwide), between 9am – 12am Australian Eastern Standard Time, Monday to Friday, excluding national public holidays;
 - Email to amp@yourcall.com.au;
 - Online at yourcall.com.au/report using AMP1849 as the organisation ID;
 - Mail to Locked Mail Bag 7777, Malvern VIC 3144 Australia;
 - If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service (Australia) or New Zealand Relay. Simply choose your contact method at relayservice.gov.au or nzrelay.co.nz and request Your Call's hotline 1300 790 228.

You may choose to contact eligible recipients by telephone, in person, email or postal service. You can directly access the Group Whistleblowing Program by email: whistleblowing@amp.com.au.

If you are an eligible whistleblower, you will also receive protections under the Corporations Act (and/or the *Tax Administration Act 1953* (Cth) where applicable) if you make a report to one of the other contacts set out in the Appendix to this policy.

If you wish to seek additional information about the whistleblowing process or protections before formally making a disclosure you can contact the Group Whistleblowing Officer with any questions you may have.

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

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

- that your concern is being raised pursuant to this policy;
- the nature of the disclosable matter and when and where it occurred or is likely to occur;
- the name(s) of people believed to be involved in the disclosable matter;
- any material to support the matters raised in your concern, such as documents or the names of potential witnesses; and
- any steps you may have taken to report the matter elsewhere.

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

- you give your consent for the disclosure of that information;
- the disclosure is allowed or required by law (for example, disclosure to a lawyer to obtain legal advice, or disclosure to ASIC, APRA, the Australian Federal Police or, in relation to tax matters, the Commissioner of Taxation); or
- in the case of information likely to identify you, it is reasonably necessary to disclose the information for the purposes of an investigation, but your identity is not disclosed and all reasonable steps are taken by AMP to prevent someone from identifying you.

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

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

Please note that, in order to support confidentiality, AMP takes a number of steps, including limiting access to your report and carefully reviewing and potentially de-identifying certain aspects of your report.

7. Can disclosures be made anonymously?

You can make an anonymous disclosure if you do not want to reveal your identity by using Your Call and you will still be protected by the whistleblowing provisions under the Corporations Act and our policy. Your Call's online system allows you to message the Group Whistleblowing Program while remaining anonymous. Alternatively, you may wish to adopt a pseudonym for the purpose of your disclosure.

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

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

8. How will AMP respond?

All reports of disclosable matters must be referred to the Whistleblowing Program (provided consent has been obtained from the whistleblower) and/or Whistleblowing Protection Officer to ensure they are managed in accordance with this policy.

Reports made under this policy will be received and treated sensitively and seriously, and dealt with promptly and objectively.

All disclosures will be assessed and considered by AMP and a decision will be made by AMP as to whether they qualify for protection as a disclosable matter and whether a formal in-depth investigation is required. AMP's response to a disclosure will vary depending on the nature of the disclosure (including the amount of information provided).

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

Where possible and appropriate, a member of the Whistleblowing Program will conduct the investigation (which may include a formal, in-depth investigation or less formal process depending on the nature of the matter) and provide findings to the relevant decision maker. If the investigation is delegated outside of the Whistleblowing Program, the investigator will be from a different business unit from which allegations have been made, the person who has made the disclosure, or any person who is the subject of the disclosable matters.

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

The objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported. Findings will be made on the balance of probabilities and will be that either the allegation(s) are:

- fully substantiated;
- partly substantiated (for example, if one but not all allegations are substantiated);
- disproven;
- not able to be substantiated; or
- unsubstantiated.

AMP will, where possible, communicate the findings of any investigation arising from a concern regarding disclosable matters to the whistleblower, however full details of the outcome may not always be available for reasons relating to confidentiality, privacy and the legal rights of those concerned.

The method for documenting and recording the findings of a formal in-depth investigation will depend on the nature of the report. Generally, at the conclusion of an investigation, the Whistleblowing Investigation Officer will submit a written report of their findings to the Group Whistleblowing Officer which will in turn be provided to the relevant decision-maker, subject to applicable confidentiality requirements. Any report prepared in relation to an investigation remains the property of AMP and will not be provided to a whistleblower or any other person to whom a concern relates. Where an investigation identifies misconduct or other inappropriate conduct, appropriate disciplinary action may be taken in AMP's discretion. This may include, but is not limited to, terminating or suspending the employment or engagement of a person(s) involved in any such conduct.

If an investigation finds that criminal activity is likely to have occurred, the matter may be reported to law enforcement bodies and/or other regulatory authorities by the relevant area within AMP.

Roles and responsibilities

Any disclosures received via Your Call will be referred to the Whistleblowing Program, unless they may implicate the Group Whistleblowing Officer, in which case they will be referred to the Chair of the AMP Limited Board Audit Committee.

Any investigations under this policy will be conducted by a Whistleblowing Investigation Officer or their delegate. The Whistleblowing Investigation Officer may involve other AMP staff to assist or may delegate the investigation to an external investigator or other suitably qualified third party. All AMP staff, directors and officers must co-operate fully with any investigation that is undertaken.

All whistleblowers who raise a concern under this policy will have access to the assistance of the Whistleblowing Protection Officer or their delegate as provided in this policy. If you consider that you have been subject to any detriment as a result of

raising a concern, you should escalate this to the Whistleblowing Protection Officer who will decide the appropriate course for handling the matter.

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

9. What protections exist for whistleblowers?

AMP is committed to protecting whistleblowers from any detriment arising as a result of them raising a concern of disclosable matters. These protections are an essential element of creating an environment in which whistleblowers feel safe to raise disclosable matters.

Some laws also contain protections for whistleblowers. Information regarding the relevant Australian laws is contained at Appendix 1.

Protection from detriment

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

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

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

You should tell the Whistleblowing Protection Officer or their delegate if you or someone else is being, or has been subject to, detrimental conduct. AMP will at all times be able to raise and address with a whistleblower matters that arise in the ordinary course of their employment or contractual relationship with AMP (for example, any separate performance or misconduct concerns) or to take appropriate action to seek to prevent detriment against a whistleblower.

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

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

Civil, criminal and administrative liability protection

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

Other protections available

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

- risk assessments undertaken to determine the risk of detriment against a whistleblower;
- monitoring and managing the behaviour of other employees;

- access to support services such as EAP or alternate providers (when applicable);
- accessible training for management to understand their responsibilities to maintain confidentiality of a disclosure;
- relocating individuals (which may include the people alleged to have been involved in the disclosable matters) to a different division, group or office; and/or
- offering an individual a leave of absence or flexible workplace arrangement while a matter is being investigated.

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

10. Escalations relating to the Whistleblowing Process or Outcome

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

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

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

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

11. Reporting

The AMP Limited Board (Board) and relevant entity boards (where appropriate) will receive summary information in relation to concerns raised under this policy on a quarterly basis, including metrics on disclosures made. This may include, for example, a summary of the number, nature and outcome of matters that have been raised under this policy. The Board may also be provided with additional information about any material incidents raised. Information received by the Board will be de-identified as required.

12. Availability of this policy and training

AMP staff (including new staff) will have access to a copy of this policy on the intranet and will receive training about the policy and their rights and obligations under it. Key AMP staff, including those involved in its Whistleblowing Program, will also receive regular training, including in relation to how to respond to protected disclosures where relevant.

A copy of this policy will also be available on AMP's public website. A hard copy of this policy may be obtained by contacting Group Whistleblowing Officer.

13. Data protection

The AMP Privacy Policy (as amended from time to time) outlines how personal information will be collected, used, disclosed and handled by AMP. Unless contrary laws prevent AMP from doing so, all personal information that forms part of a protected disclosure will be treated in accordance with AMP's Privacy Policy as well as any applicable privacy or data protection laws.

14. Periodic review

This policy will be reviewed annually to check it is operating effectively and whether any changes are required. The policy was last updated in January 2022.

15. Contacts

Any questions in relation to the interpretation or operation of this policy should be directed to the Group Whistleblowing Officer.

If you are a current employee, you (or your immediate family) may access the AMP Limited Employee Assistance Program which can be contacted on 1300 687 327 within Australia or 0800 666 367 (New Zealand) or +61 3 8620 5300 (worldwide).

16. Roles and responsibilities

The roles and responsibilities with regard to the policy are set out in the table below.

AMP Limited Audit Committee / Chair	<ul style="list-style-type: none"> Oversees the Whistleblowing Program and manages escalated complaints raised in accordance with this policy, including on behalf of the Trustee and other AMP regulated entities Ultimately responsible for this policy, as part of AMP's broader risk management and corporate governance framework, and that emerging risks identified through the program are incorporated as part of its risk management and corporate governance work plans
Trustee and other Board Audit Committees of AMP regulated entities	<ul style="list-style-type: none"> Receives summary information from the Group Whistleblowing Officer in relation to concerns raised under this policy on a quarterly basis, including metrics on disclosures made as relevant to the corporate entity or superannuation trustee
Group Chief Risk Officer	<ul style="list-style-type: none"> Champions the Whistleblowing Program and oversees the implementation and effectiveness of the program Appoints the roles within the Whistleblowing Program
Group Whistleblowing Officer	<ul style="list-style-type: none"> Responsible for the Group's Whistleblowing Program and ensuring the AMP Whistleblowing Policy and standards are up to date Receives and assesses reports from Whistleblowing channels Provides quarterly reporting on whistleblowing to relevant Committees and Boards Accountable for notifying the Chairs of the relevant board audit committee(s) of disclosures to be investigated by a Whistleblowing Investigation Officer Accountable for referring misconduct matters for management action in accordance with the Management of Conduct Policy
Whistleblowing Investigation Officer	<ul style="list-style-type: none"> Designated person(s) within AMP responsible for investigating disclosures Conducts investigations on disclosable matters, in a timely manner. This may include the use of internal or external investigative resources Keeps whistleblowers informed of the investigations' progress as appropriate Reports the investigations outcomes

Whistleblowing Protection Officer

- Designated person(s) or their delegates within AMP who are responsible for protecting whistleblowers from detriment as result of making a report
- Supports and protects whistleblowers from detriment as a result of making a disclosure
- Authorised to provide certain protections where he/she deems this appropriate for fulfilling their role

17. Interactions with related documents

The documents listed below support this Policy.

Gifts & Benefits Policy	Sets the requirements when offering or accepting gifts or benefits to or from external parties
Anti-Bribery & Corruption Policy	Provides the principles by which AMP will operate in order to meet its Anti-Bribery & Corruption obligations
Code of Conduct	The overarching code describing the required behavioural standards for AMP employees
Complaints Handling Policy for Workers	Sets out AMP's approach to the management of worker's complaints and grievances
Fraud Policy	Sets out the principles and standards for the management of fraud risks and incidents within AMP
AMP Privacy Policy	Sets out the how personal information will be collected, used, disclosed and handled by AMP
Consequence Management Policy	Sets out AMP's approach for managing poor conduct.
Incident, Issue and Breach Management Policy	Outline's AMP's minimum requirements across the key stages of the incident, breach and issue management lifecycle, guiding principles supporting the policy, and the roles and responsibilities of staff.
Regulator Engagement Policy	Sets out AMP's overarching principals and approach at an enterprise level for engaging with AMP's regulators and other regulatory bodies (collectively Regulators) to maintain trust and confidence.

18. Compliance with this Policy

This is a Group-wide Policy that applies to all AMP entities in all countries where AMP operates. This Policy sets out the minimum standards required. Additional requirements may apply in some circumstances, for example international staff in overseas jurisdictions. In addition to meeting the minimum requirements of this Policy, you will also need to comply with any local or entity specific requirements, policies, and procedures where they exceed the requirements of this Policy. Where other obligations are inconsistent with this Policy, these inconsistencies should immediately be referred to the Policy Owner.

Where there are specific jurisdictional requirements, and these differ to the Policy requirements, the following approach must be adopted:

- Where specific jurisdictional requirements exceed the Policy, the jurisdictional requirements are to be adhered to in addition to the Whistleblowing Policy requirements;

- Where specific jurisdictional requirements are less onerous than outlined in the Whistleblowing Policy, the requirements of the Policy must be adhered to;
- Where specific jurisdictional requirements are inconsistent with the Whistleblowing Policy, this is to be escalated and reported to the Policy Owner; and
- Generally the more conservative of the two – Policy or jurisdictional requirement – is adopted.

Failure to comply with the Policy poses regulatory risk to AMP in both Australia and abroad and can result in both civil and criminal penalties as well as reputational and other damage.

Any instances of non-compliance with this Policy should be treated in accordance with the [Incident, Issue and Breach Management Policy](#).

Where you have a concern that a serious breach of this Policy has occurred or will occur, and that pursuing your concern through the normal channels will be personally damaging, you should report your concern to the Whistleblowing Protection Officer in accordance with this Policy.

A breach of this Policy may be considered as misconduct and may result in re-assessment or revocation of bonus or incentive allocation and/or disciplinary action up to and including termination of your employment or services.

An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.

19. Terms and conditions

This Policy does not form part of any contract of employment or engagement and does not give rise to any contractual obligation by the AMP Group. This Policy may be amended, replaced or revoked at any time by AMP at its discretion.

20. Reporting externally

Nothing in this policy is intended to restrict a whistleblower from raising a concern regarding disclosable matters, providing information to, or communicating with a government agency, law enforcement body or a regulator in accordance with any relevant law, regulation or prudential standard applicable in a jurisdiction in which AMP operates. AMP staff may also be legally required to report certain matters to government or regulatory bodies.

It is recommended that any individuals contemplating reporting matters outside of AMP first seek independent advice in relation to their legal rights and obligations.

Appendix: Protections for whistleblowers provided by Australian law

How will I be protected if I raise a concern?

AMP protects the confidentiality of whistleblowers who raise concerns. We do this by limiting how both your identity and information that is likely to lead to your identification is shared. Your identity will be kept confidential to the fullest extent possible and only shared as permitted by you or by law.

AMP also protects whistleblowers from detriment caused because they raised a concern or plan to raise a concern. We do not tolerate anyone threatening to cause or causing detriment to you because of your desire or decision to raise a concern. Doing so is taken seriously by AMP and may lead to disciplinary action.

In certain circumstances, these protections will also be enforceable under the Corporations Act or the Tax Administration Act (where a report relates to a breach of Australian tax law or tax-related misconduct).

When will I be protected?

You will be qualify for protection under this policy and the Corporations Act (and the Tax Administration Act, where applicable) if you are an eligible whistleblower and you raise a concern with one of the eligible recipients nominated in this policy or to another eligible recipient of a disclosable matter under the Corporations Act or Tax Administration Act, which includes:

- a director, officer or senior manager of AMP;
- an auditor, or a member of the audit team conducting an audit of AMP;
- an actuary of AMP (excluding in relation to tax-related disclosable matters);
- an employee or officer of AMP with functions or duties that relate to the tax affairs of AMP, or a registered tax agent or BAS agent who provides tax agent or BAS services to AMP, in relation to tax-related disclosable matters;
- ASIC or APRA, or the Commissioner of Taxation for tax-related matters where it may assist the Commissioner to perform their statutory functions and duties; or
- a legal practitioner, for the purpose of obtaining legal advice or legal representation in relation to your concern.

In limited circumstances, certain "public interest" or "emergency" disclosures to journalists and members of Commonwealth, state or territory parliament are also protected by law. Certain steps need to be taken before a "public interest" or "emergency" disclosure

can be made to one of these people and it is important that you understand these. For example, you must have previously made a disclosure to ASIC, APRA or another prescribed body before you can make a "public interest" or "emergency" disclosure and, in the case of a "public interest" disclosure, at least 90 days must have passed since the previous disclosure. Please contact the Group Whistleblowing Program if you would like more information about "emergency" and "public interest" disclosures.

What should I do if a protection is breached?

AMP takes any breach of these protections seriously. Where you believe a breach has occurred, you should raise a concern with the Whistleblowing Protection Officer.

Where your report is about how your concern was handled, you should raise your concern with the Whistleblowing Protection Officer or the Chair of AMP Limited Board. If you suffer detriment because you have or propose to raise a concern, you may be entitled to compensation or other remedies in some circumstances.

Is anything not covered by AMP's Whistleblower Program?

AMP's Whistleblowing Program and the protections under the *Corporations Act* generally do not apply to personal work-related grievances. Instead, these matters should be reported in accordance with AMP's Complaints Handling Policy for Workers.

However, this policy and the Corporations Act may still apply in some circumstances, such as where your concern:

- relates to any detriment caused to you as a result of raising a concern regarding a disclosable matter;
- relates to a disclosable matter or misconduct beyond your personal circumstances (e.g. relating to AMP or other individuals); or
- has significant implications for AMP.

Where in doubt, you should make your report to the Group Whistleblowing Officer. They will make sure your report is dealt with under the right policy.