

Whistleblowing policy



What you need to know

- You are encouraged to report matters of actual or suspected illegal, unacceptable or undesirable conduct (reportable conduct) through your leader, leader's leader or the People & Culture team via the People & Culture Advice Line, except where you believe you may suffer personal disadvantage or wish to use the protections under this policy
- If you do not feel comfortable or able to report reportable conduct internally, you can report it to our external and independent provider Your Call. We have contracted Your Call to receive reports impartially and confidentially. Contact Your Call 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 AustraliaIf you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service (Australia only). Simply choose your contact method at www.relayservice.gov.au and request Your Call's hotline 1300 790 228
- Alternatively, you can report reportable conduct directly to the Whistleblowing Protection Officer, Jenny Fagg, by calling 0434 618 696 or by email to Jenny_Fagg@amp.com.au

Overview	The whistleblowing policy (policy) sets out AMP's approach to encourage and support the reporting of reportable conduct, and protect whistleblowers from any retaliation that may arise as a result of their disclosure
Objective	To encourage, and support the reporting of reportable conduct by providing assurance to whistleblowers that it is safe for them to do so
Scope	This policy applies to directors, employees, contractors, consultants, suppliers, third party providers, secondees, advisers, brokers, auditors and former employees
Policy owner	Chief Risk Officer
Policy approver	AMP Limited, AMP Life, AMP Bank, ASL and NM Super Boards
Effective date	June 2017
Review date	June 2019

1. Background

Professionalism, honesty and integrity are core to our business and everything we do needs to be measured against the highest possible standards. AMP is committed to identifying and responding to reportable conduct, and fostering a culture of continuous improvement.

2. Policy principles

AMP has adopted the following principles in relation to AMP's whistleblowing program:

- AMP will support and protect whistleblowers who act honestly, reasonably and with genuine belief about the reportable conduct, from reprisals that stem from making a disclosure. AMP is not able to extend the full level of protections and support set out in this policy to whistleblowers who are not employed by AMP
- AMP will conduct investigations in an objective, independent and confidential manner. Appropriate corrective action will be taken as warranted by the investigation
- AMP will not take any disciplinary action against a whistleblower where a disclosure is unable to be substantiated or is found to be untrue, when the disclosure was made with a genuine or reasonable belief regarding the reportable conduct
- AMP may pursue legal or disciplinary action against a whistleblower acting with malicious intent or who knowingly provides any part of a false disclosure. In such circumstances, AMP may not extend protection or indemnify a whistleblower against reprisals (including civil actions)
- AMP will not prevent (whether through confidentiality agreement or otherwise) a prospective, current, or former company officer, employee or contractor (including professional service providers) in making a disclosure to a regulator.

3. Policy requirements

The minimum standards required to meet the policy principles are set out below:

- All disclosures are to be treated as being submitted on a confidential basis, subject to any regulatory or legislative requirements or where the reportable conduct involves a threat to life, property or may involve, or potentially involve, illegal activities
- Disclosures may be made from anyone with a connection to any AMP group entities which includes employees, contractors, consultants, suppliers, third party providers, secondees, advisers, brokers, auditors and former employees
- Whistleblowers must be supported and protected. It is not acceptable to terminate, demote, suspend, threaten, harass or in any other manner discriminate against a whistleblower
- The identity of whistleblowers who wish to remain anonymous must be omitted from all reports relating to the disclosure
- Investigations of reportable conduct are to be treated in a manner that is confidential, fair and reasonable
- All records relating to whistleblower disclosures are to be retained in secure storage for a minimum period of 7 (seven) years unless local requirements specify a greater retention period.

4. Whistleblowing reporting and investigation process

- Disclosures of reportable conduct must be based on information that is directly known to the person making the disclosure. That person must have reasonable grounds to suspect the alleged conduct has occurred.
- Reports may be made through Your Call, an external and independent provider, contracted to receive reports impartially and confidentially, via:
 - Phone: 1300 790 228 (Australia), 0800 123 508 (New Zealand) or +61 3 9895 0012 (International), 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
- Alternatively, reports may be made by contacting the Whistleblowing Protection Officer (WPO) Jenny Fagg on 0434 618 696 or Jenny_Fagg@amp.com.au
- All reports are treated in confidence, and the option to remain anonymous is available, however in remaining anonymous AMP is limited in its ability to protect and support the whistleblower
- Disclosures received will be assessed as to whether further investigation is appropriate, the matter will then be referred to a Whistleblower Investigation Officer (WIO) for investigation
- The whistleblower will be informed of the WIO's appointment and the WIO will contact the whistleblower to acknowledge receipt of the disclosure and to establish a process, including expected timeframes, for reporting to the whistleblower on the progress of dealing with the disclosure
- The whistleblower will be contacted by the WPO, as soon as practicable, to discuss their welfare and to discuss a communication process, if required
- If it is determined that there is insufficient information or evidence to warrant further investigation, the whistleblower will be informed at the earliest possible opportunity. No further action will be taken
- Any disclosures received via Your Call which may implicate the WPO, will be referred to the chair of the AMP Limited Board Audit Committee
- Where a formal investigation is initiated, this will be a fair and independent process, without bias, conducted by the WIO or their delegate. Investigations will be independent of the business unit in respect of which allegations have been made, the person who has made the disclosure, or any person who is the subject of the reportable conduct
- The whistleblower will be informed by the WIO of the final outcome of the investigation, where appropriate
- Where investigations substantiate an allegation arising from the disclosure, the matter will be dealt with in accordance with established administrative or disciplinary procedures, which may result in disciplinary action, including termination of employment
- Any matters of a criminal nature will be reported to the police and, if appropriate, other appropriate regulatory authorities
- If a person who makes a disclosure considers that their disclosure has not been dealt with in accordance with this policy, or that they have been subject to retaliation as a result of making the disclosure, the matter can be escalated to the WPO. The WPO, in consultation with People & Culture, will determine the most appropriate course for handling the matter, which may include informal resolution options or a formal investigation.

5. Roles and responsibilities

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

Chief Risk Officer	<ul style="list-style-type: none"> Designates the roles of Whistleblowing Investigation Officer and Whistleblowing Protection Officer Provides quarterly reporting on whistleblowing to the group risk and compliance committee (GRCC), the board audit committees for AMP Bank, AMP Limited, AMP Life, and the ASL and NM Super boards
Whistleblowing Investigation Officer	<ul style="list-style-type: none"> Conducts investigations on reportable conduct, in a timely manner. This may include the use of internal or external investigative resources Keeps the whistleblower informed of the investigation's progress Reports the investigation outcome
Whistleblowing Protection Officer	<ul style="list-style-type: none"> Receives and assesses reports from whistleblowing channels Protects and supports whistleblowers from personal disadvantage as a result of making a disclosure Provides advice to anyone covered by this policy prior to, during, or after a disclosure Accountable for notifying the chairs of the relevant board audit committee(s) of disclosures to be investigated by a WIO.
Whistleblower	<ul style="list-style-type: none"> All reports must be made with a genuine and reasonable belief regarding the reportable conduct Provide as much information as possible and any known details relating to the reportable conduct (e.g. date, time, location, name of person(s) involved, evidence such as documents or emails, possible witnesses, and any steps that may have been taken to report the matter elsewhere to try to resolve the concern) Can choose to remain anonymous via the whistleblowing channels. However, whistleblowers are encouraged to identify themselves to assist with providing any further information and to ensure that protection and support is provided

6. Interactions with related documents

The documents listed below support this policy.

Business integrity policy	Sets out the standards and behaviours that all AMP employees must meet
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

7. Compliance with this policy

This policy sets out the minimum standards required for AMP employees. Additional requirements may apply in some circumstances, for example international employees in overseas jurisdictions. In addition to meeting the minimum requirements of this policy, AMP employees will also need to comply with local or entity specific requirements, policies, and procedures where they exceed the requirements of this policy. Where specific requirements are inconsistent with this policy these should immediately be referred to the policy owner.

Any instances of non-compliance with this policy should be treated in accordance with the [AMP incident management process](#). Where AMP employees are concerned that a breach of this policy has occurred or will occur, and that pursuing their concern through normal channels will be personally damaging, they should report their concern in accordance with this policy.

Non-compliance with this policy may result in disciplinary action up to and including termination of employment.

8. Terms and conditions

This policy does not form part of any contract of employment or contract of engagement and may be amended, replaced or revoked at any time by AMP at its discretion.

9. Definitions

In this policy, words and phrases have the meaning provided below.

Disclosure	The deliberate and voluntary disclosure or attempted disclosure of information that alleges the actual or suspected existence of reportable conduct
Reportable conduct	Conduct that is illegal, unacceptable or undesirable. This may include conduct or behaviour (actual or attempted) that is: dishonest; unethical; fraudulent; corrupt; non-compliant or may give rise questionable accounting or auditing practices; or inconsistent with the AMP code of conduct Reportable conduct can include the actions of a third parties such as suppliers or service providers
Whistleblower	Any person who makes (or attempts to make) a disclosure
Whistleblowing Investigation Officer	Designated person(s) within AMP responsible for investigating disclosures
Whistleblowing Protection Officer	Designated person(s) within AMP who are responsible for protecting whistleblowers from personal disadvantage as a result of making a report. The Whistleblower Protection Officer is authorised to provide certain protections where he/she deems appropriate for fulfilling their role