

# Code of Conduct

Australian Logistics Acquisition  
Holdings Pty Limited  
ACN 611 628 909



## **UPDATES**

14 October 2016      Adopted by the Board.

# CODE OF CONDUCT

References in this policy to Pacific National (the Company or Pacific National) include references to the entire group comprising Australian Logistics Acquisition Holdings Pty Limited (ACN 611 628 909) and each of its subsidiaries and the business conducted by them.

## Framework Structure

The key sections of Pacific National's Code of Conduct include:

- Code of Conduct
- associated Whistleblower Framework

The Policy should be read in conjunction with the Pacific National Fraud & Corruption Prevention Policy and Fraud & Corruption Prevention Framework.

## Purpose

The purpose of the Code of Conduct is to:

- define our commitment to behave with honesty and integrity and to promote ethical and responsible decision making by all directors, officers, employees and contractors;
- define the minimum standards of behaviour that must be applied by all Pacific National directors, officers, employees and contractors;
- support the detection and reporting of inappropriate conduct;
- help provide employees and contractors with a supportive working environment in which they feel confident to raise issues of legitimate concern to them and to Pacific National;
- provide a helpline service (STOPline) which can be used for reporting improper conduct;
- define our commitment to investigating reported incidents; and
- help protect people who report unacceptable conduct in good faith.

## Commitment

Pacific National is committed to creating long term and sustainable value. We believe the best way to achieve this goal is to behave with honesty and integrity and to promote ethical and responsible decision making by all directors, officers, employees and contractors.

By consistently behaving in this manner we are seeking to build sustainable and valuable relationships with our customers, employees, contractors, suppliers, governments and the community.

To help us achieve these goals we have developed the Pacific National Code of Conduct.

## Code of Conduct

The Code of Conduct defines the minimum standards of behaviour that must be applied by all Pacific National directors, officers, employees and contractors in order to demonstrate the required outcomes we are seeking.

All Pacific National directors, officers, employees and contractors, no matter which part of the business they work in, are required to comply with the Pacific National Code of Conduct.

## Whistleblower Framework

A key element of the Pacific National Code of Conduct is the obligation on all Pacific National directors, officers, employees and contractors to report, in good faith, any reasonable suspicions of inappropriate behaviour, corrupt practices, breaches of the law or any breaches of the Code of Conduct. The Whistleblower Framework (as described in the attachment to the Code of Conduct) provides the mechanism by which such reporting can be made.

Individuals who report, in good faith, any suspected violations of the standards, requirements and expectations described in the Code of Conduct will be protected and, if requested, their report will remain confidential unless disclosure is required by law.

Pacific National is committed to maintaining a supportive and open environment in which directors, officers, employees and contractors are able to report suspected instances of unethical, unlawful or undesirable conduct without fear of intimidation or reprisal.

This Whistleblower Framework is designed to complement the normal communication channels between management and employees. If an employee or contractor has any concerns about what is proper conduct for themselves or others, it is expected that in most cases those concerns would be raised with the employee's or contractor's immediate supervisor. The matters should in turn be escalated through appropriate management channels in the normal course of business.

## Compliance

Procedures will be established by the Audit and Risk Committee to promote compliance with this Code of Conduct. Compliance with the Code of Conduct by directors, officers, employees and contractors will be reviewed. Non-compliance with the Code of Conduct may result in disciplinary action, including dismissal from employment in serious cases, and may also amount to breaches of the law.

## Further Information

Directors, officers, employees and contractors should read the Code of Conduct carefully and familiarise themselves with the policy and procedures detailed in it.

If you have any questions on the Code of Conduct, or require further information, contact the Company Secretary.

## Board Review

The Board will review the Code of Conduct annually and the Company Secretary will communicate any amendments to employees as appropriate.

# CODE OF CONDUCT

## Code of Conduct

No matter what we do, or where we work, as directors, officers, employees and contractors of Pacific National, we must act safely and behave with honesty and integrity. To achieve this we must:

- Continually strive to provide a safe and healthy work environment for all employees;
- Be a good corporate citizen, including complying with the laws and regulations in each state and territory in which Pacific National operates;
- Act honestly and with integrity and with respect for the interests of all of our stakeholders, both internal and external;
- Avoid any personal, financial or other real or apparent conflicts of interest that could compromise the performance of our duties;
- Use Pacific National's assets (including funds, equipment and information) responsibly and in the best interests of Pacific National;
- Maintain the privacy of private and confidential information, including customer, business partner and fellow employee information;
- Communicate accurate information in a transparent and timely manner to all stakeholders, including shareholders, regulators and the investment community;
- Comply with Pacific National's policies and procedures and be responsible and accountable for our actions; and
- Report, in good faith and as appropriate, any suspected violations of the standards, requirements and expectations described in this Code of Conduct.

The behavioural requirements set out in the Code of Conduct are not intended to address every circumstance that may arise. They are intended to provide a set of guidelines on what is considered to be acceptable and appropriate behaviour.

This Code of Conduct does not describe every law, regulation or Pacific National requirement that may apply to directors, officers, employees and contractors. Directors, officers, employees and contractors should make sure that they know the rules that do apply to them and comply with those rules. The laws that govern our activities are complex, but lack of knowledge does not relieve us from an obligation to comply. If directors, officers, employees and contractors have any questions, they must seek advice.

Pacific National expects all directors, officers, employees and contractors to comply with the standards set out in this document. All managers and supervisors are expected to lead by example and both actively promote our Code of Conduct and quickly respond to breaches or concerns raised by others.

# Behavioural Requirements

## 1. Promote a Safe and Healthy Workplace

Pacific National is committed to the provision and maintenance of a safe working environment to ensure the health and safety of everyone who interacts with our business. You must comply with Pacific National's Health & Safety Policy (and those policies and procedures of each Business Unit of Pacific National) and assist those working with you to do the same.

Pacific National seeks to provide a safe workplace where there are no injuries and where you take care of yourself and others. In order for us to achieve this objective, you are required to:

- Attend for duty fit and able to safely perform your duties;
- Comply with all Policies & Procedures specific to the Business Unit in which you work, as well as to the broader Pacific National Group, and to your role and in accordance with any instructions given to you by your supervisor from time to time;
- Perform your work in a safe manner and in accordance with the procedures and standards relevant to Pacific National so that you return Home Safely, Everyday; and
- Immediately report any safety hazards or unsafe conditions appropriately.

## 2. Comply with the Law

Pacific National must comply with the laws and regulations in each state and territory in which Pacific National operates its business. In order for us to achieve this objective, you are required to:

- Familiarise yourself with the relevant legislation, policies and procedures relating to your area of work;
- Comply with both the letter and the intent of all relevant laws and regulations;
- Seek clarification and/or assistance from your supervisor should you have any doubts in relation to your legal compliance requirements;
- Not be involved in improper tendering or price fixing or market sharing. If present when improper tendering or pricing is suggested, you should refuse on the spot and then report the matter to your Business Unit Lawyer or Company Secretary as soon as possible;
- Obtain advice from your supervisor, your Business Unit Lawyer or the Company Secretary if you have any doubts or concerns about any planned actions; and
- Attend all mandatory training and information sessions you are invited to and co-operate with information and other requests when required.

## 3. Act Honestly and with Integrity

It is extremely important for Pacific National to maintain its reputation as an honest and fair corporate citizen that acts with integrity. In order for us to achieve this objective, you are required to:

- Display respectful behaviour towards customers, fellow employees and the general public. This includes treating all persons equally and with dignity and not discriminating on the basis of age, sex, race, political opinion or other personal characteristics;
- Not engage in misleading or deceptive conduct or falsify or wrongly withhold information;
- Not risk compromising our long-term reputation by seeking to make inappropriate short-term gains;
- Not deliberately falsify, conceal or destruct documentation that is intended for use for a normal business purpose; and
- Not use company assets or your position within the Company to seek personal gain, or to obtain a dishonest advantage over others.

#### **4. Avoid real or apparent conflicts of interest**

In maintaining its reputation as an honest and fair corporate citizen, Pacific National requires all directors, officers, employees and contractors to actively avoid any real or perceived conflicts of interest. In order for this objective to be achieved, you are required to:

- Put Pacific National's interests first when it comes to work and work related matters and not give preference to personal interests, or the interests of any other person, where to do so would be in conflict with the Company's interests;
- Not have a material or controlling interest in any competitor, customer, contractor or supplier;
- Obtain written approval prior to commencing any secondary employment or any voluntary work that may conflict with or otherwise impact on your ability to perform your Pacific National duties; and
- Disclose any potential real or apparent conflicts of interest to your supervisor and not act in such circumstances until the matter has been appropriately investigated and resolved.

You must promptly advise your supervisor or manager in writing of any outside activities, financial interests or relationships that may involve you either in an actual conflict of interest or the appearance of one. Your supervisor will consider the matter and advise you whether it is appropriate for you to resume any discussions or activities that involve the conflict.

#### **5. Avoid inappropriate business dealings and notify receipt of gifts**

Pacific National is committed to conducting its business dealings with the highest commercial standards. In order for this objective to be achieved, you are required to observe the following protocols:

- Directors, officers, employees and contractors, from time to time, may entertain or be entertained and give or receive gifts in the course of their duties. If offered, you may accept gifts, hospitality or services from business contacts with a value of less than A\$250. Anything in excess of that value must be notified to your direct manager or One-Up Manager and approval must be sought prior to accepting (in the case of the CEO or directors, this will be to

the Chairperson). You must also send a copy to the Company Secretary together with a declaration of the nature and value of the gift and the manager's decision. Under no circumstances should you accept any gifts, hospitality or favours from any firm or person for either yourself or your family and friends from anyone we do business with that could be construed as potentially influencing a business outcome or give rise to the perception that a business outcome may be influenced by the gift;

- Exercise care in giving business related gifts and ensure gifts and hospitality are not given where they may be construed as potentially influencing the conduct of the recipient;
- Directors, officers, employees and contractors involved in a tendering process, contract negotiation, contract renewal or extension must refrain from actions which may give rise to an expectation of some favoured treatment from or by any tendering party. In these circumstances, no gifts, hospitality or services may be accepted from a tendering party or party with whom negotiations are being conducted;
- Ensure Pacific National does not, and is not perceived as a company that would, accept or receive or in any way condone the giving or receiving of bribes or 'facilitation payments' – this includes payments to government officials to obtain routine services to which Pacific National is otherwise legally entitled;
- Not accept, make or approve any irregular payment or gift to win business or influence a business decision in our favour – this includes rebates, bribes, kick backs, secret commissions and like payments. Bribes and other corrupt payments are not only a contravention of this Code of Conduct, but making or accepting them is a criminal offence;
- Inform the Company Secretary where you have any uncertainty about the appropriateness of the nature of any payment or gift;
- Not contribute funds to any political party or candidate for an election or sponsor any organisations (other than in a purely personal capacity) without seeking and obtaining prior approval from the CEO; and
- With respect to any Government Official (foreign or domestic) (as it is defined in the Pacific National's Fraud and Corruption Prevention Policy): no gifts in the form of cash or currency may be given. Token gifts to Government Officials for non-corrupt purposes may be given only in connection with Company promotional events, with national, traditional or religious holidays or where customary, to celebrate significant personal events, such as marriages or births. Under no circumstance may even a customary gift be given in exchange for improperly favourable treatment by a Government Official. Meals and entertainment to Government Officials must also meet the policies set forth in the Fraud Corruption and Prevention Policy. All directors, officers, employees and contractors must consult with the Company Secretary if there are any doubts as to the appropriateness of providing meals, lodging, travel, or entertainment to a Government Official.

## **6. Protect Pacific National's Assets**

Pacific National seeks to ensure all its assets are used responsibly and in the best interests of Pacific National's shareholders. Pacific National's assets may include property, time, proprietary information, corporate opportunities and funds, as well as equipment used by individuals such as mobile phones and computers. In order for this to be achieved, you are required to:

- Not use Pacific National's assets for personal gain;
- Take reasonable steps to ensure Pacific National's assets are used efficiently and for business purposes only; and
- Ensure that Pacific National's assets are secured against theft and are properly stored, maintained and repaired at all times.

## **7. Maintain and protect private and confidential information**

Pacific National seeks to comply with Privacy Laws and to protect personal and confidential information, including customer, supplier, business partner and employee information. In order for us to achieve this objective, you are required to:

- Comply with all legal requirements that apply to the collection, use and retention of personal information. Only collect, use and retain personal information that is necessary for legitimate activities and functions;
- Take care to ensure confidential information is kept secure and ensure you comply with Pacific National's Privacy and IT Security policies;
- Comply with the document retention policies and procedures;
- Respect the confidentiality of Company, customer, supplier and or employee information acquired in the course of business and not disclose such information without the written consent of the Company Secretary, unless the disclosure is required by law;
- Not use confidential information for personal gain or other improper purposes.

## **8. Respect financial market stakeholders**

Pacific National is required to comply with Corporations Act, and the insider trading provisions of the Corporations Act, and seeks to respect our stakeholders and the financial community. Pacific National seeks to adhere to high ethical and legal standards in relation to its investments.

In order for us to achieve this objective, you are required to:

- Not deal in shares of other companies if you possess "inside information" or price sensitive information in relation to that other company. For example, you may become aware of price sensitive information relating to vendors, customers, contractors or joint venture partners of Pacific National, i.e. if you know that Pacific National is about to sign a significant and material agreement with another company, you must not buy shares in the other company and must not share the information with anyone else or encourage anyone else to buy shares in the other company.
- Not make public statements or external announcements (whether verbal or written) about Pacific National or other companies or organisations which Pacific National has dealings with

unless they are approved and issued by the CEO and/or Communications Manager. Such external announcements may include speeches, presentations, journal articles and submissions; and

- Inform the Company Secretary or the CEO of any information that you believe may be material or require disclosure to financial stakeholders.

## **9. Be accountable and comply with Pacific National's Policies and Procedures**

Pacific National requires that all officers and staff are responsible and accountable for their actions and that they comply with all of Pacific National's Policies and Procedures. In order for this objective to be achieved you are required to:

- Take responsibility for the way in which you behave and perform your duties and honestly and fully report the results of your actions;
- Ensure you are aware of and comply with Pacific National Policies and Procedures that apply to your area of work; and
- Strive to keep up-to-date with advances and changes in the body of knowledge and the professional and ethical standards relevant to your area of expertise.

## **10. Report any breaches or suspected violations of the Pacific National Code of Conduct**

Pacific National takes compliance with this Code of Conduct seriously and requires all staff to diligently comply with its content and intent. Staff should notify their supervisor, manager, the Internal Audit and Risk Manager or the Conduct Review Officer where the standards are not complied with. In order for us to achieve this outcome, you are required to:

- Report appropriately, in good faith, any suspected corrupt practices, breaches of the law, breaches of the Code of Conduct and any other matters that may be detrimental to Pacific National or its reputation. Reports should be made to either your supervisor or One-Up Manager, the Internal Audit and Risk Manager or Business Unit HR Manager(for discrimination or harassment matters).

Pacific National is committed to ensuring staff can raise concerns regarding suspected violations of the Code of Conduct without being subject to victimisation.

All reports made in good faith will be promptly and thoroughly investigated.

## **Whistleblower Framework**

Set out in the attachment is Pacific National's Whistleblower Framework.

# ATTACHMENT

## WHISTLEBLOWER FRAMEWORK

### Conduct covered by the Whistleblower Policy

Unacceptable conduct covered by this Policy includes conduct which:

- Is a breach of Pacific National's Code of Conduct; and/or
- Is illegal, dishonest, fraudulent or corrupt, and/or
- Is unethical, such as dishonestly altering company records or data, adopting questionable accounting practices; and/or
- Is potentially damaging to Pacific National or Pacific National persons, such as unsafe work practices or substantial wasting of company resources; and/or
- May cause financial loss to Pacific National or damage its reputation or be otherwise detrimental to Pacific National's interests; and/or
- May cause serious harm to public health, safety or the environment or the health and safety of any Pacific National person; and/or
- Involves a serious risk to the maintenance of the law, including the prevention, investigation and detection of offences and the right to a fair trial; and/or
- Involves any other kind of serious impropriety.

Nothing in this Policy is intended to remove or dilute the HR team's responsibility to investigate or deal with any and all grievances that are covered by existing HR policies. Concerns related to areas of traditional HR oversight should be reported to the Business Unit or Corporate HR teams and managed via existing HR protocols.

However, this Policy recognises that there may be circumstances where such issues are of an extent or of such a serious nature that they move beyond individual grievances and may negatively impact Pacific National's goal of all staff behaving with honesty and integrity and promoting ethical and responsible decision making.

Therefore, if a director, officer, employee or contractor has any doubt as to the correct reporting route or is not comfortable raising HR issues through the HR frameworks, Pacific National encourages the concerns to be raised under this Policy and the Conduct Review Officer will assess the issue and decide how the concern should be dealt with (via the HR stream or through independent investigation).

# Who to contact for help?

## Who should I contact?

This Policy is designed to complement the normal communication channels between management and employees to address questions, concerns, suggestions or complaints. If a director, officer, employee or contractor has any concerns about what is proper conduct for themselves or others, it is expected that in most cases those concerns would be raised with the individual's immediate supervisor. The matters should in turn be escalated through appropriate management channels in the normal course of business.

Serious matters should in turn be escalated through appropriate management channels in the normal course of business.

However in the event that an individual does not feel comfortable reporting through the normal communication channels they may report their concerns through other Corporate channels or via an impartial third party whistleblower hotline – the Helpline.

## What is the Helpline?

The Helpline is a helpline operated by an independent and impartial third-party company called The STOPLine.

A Pacific National person may use the Helpline to report, or receive guidance in respect of, suspected unacceptable conduct.

Contact details for the Helpline are set out in below.

## How does the Helpline fit with Pacific National's internal systems?

It is expected that a Pacific National person will be able to resolve most concerns or queries relating to their employment with, or the operation of, Pacific National by discussing them with:

- Their immediate supervisor or another senior member of their Business Unit;
- Their or any other Human Resources manager;
- A member of the Legal Department;
- Internal Audit and Risk Manager
- The Company Secretary;
- The Conduct Review Officer; or
- The Chief Executive Officer.

However, Pacific National recognises that there may be issues of such sensitivity that a Pacific National person does not feel able to use these options. Alternatively, there may be occasions

where the person in question does not feel the concern they have raised has been adequately addressed or where they feel the advising parties may not be impartial. In these cases, the helpline is available.

Any Pacific National person proposing to make a report via STOPline should do their best to ensure that there is a reasonable basis for the report. However, it is not the reporting person's role to investigate or establish if a case of unacceptable behaviour exists.

## **What happens when I contact the Helpline?**

Where a Pacific National person contacts the helpline to discuss suspected unacceptable conduct, STOPline will make a record of all of the relevant data provided by the Pacific National person. The Pacific National person will have the option of either identifying themselves or remaining anonymous.

STOPline will refer the matter and provide a copy of its records in relation to the matter to Pacific National's Conduct Review Officer for confidential investigation.

If the Pacific National person has chosen to remain anonymous to Pacific National but has identified themselves to STOPline, no identifying information will be included in the STOPline report to Pacific National.

For further information about making reports anonymously, please refer below.

## **Disclosure protected by the Corporations Act**

There are specific and limited circumstances where a Pacific National person can have their disclosure protected under the Australian Corporations Act. In Australia, the disclosure of information relating to unacceptable conduct may qualify for certain protection where:

- The disclosure is made by an Pacific National person to the Australian Securities and Investments Commission (ASIC), Pacific National's external auditor or a member of the external audit team, a director, secretary or senior manager of Pacific National or the helpline;
- The Pacific National person making the disclosure provides his or her name prior to disclosing the information;
- The Pacific National person has reasonable grounds to suspect that the unacceptable conduct has or may have breached the Corporations Act; and
- The disclosure is made in good faith.

Where information is disclosed by a Pacific National person in accordance with these criteria, the person receiving the information may not tell anyone other than ASIC, the Australian Prudential Regulation Authority or the Australian Federal Police (or another person provided that the Pacific National person who has made the report has provided their consent for the information to be disclosed) of:

- The information disclosed;
- The identity of the person making the disclosure; or
- Any information which will enable the identification of the person making the disclosure.

# Investigating Reports of Unacceptable Conduct

## Who investigates a report?

The Conduct Review Officer will co-ordinate the investigation of reports of suspected unacceptable conduct. Depending on the nature of the report, the investigation team may include any one or more of the following:

- The Conduct Review Officer;
- Business Unit General Managers or their designated representatives;
- The head of Human Resources;
- Independent Investigators;
- The General Counsel or a legal team representative; and/or
- Internal Audit and Risk Manager

Managers will only be asked to investigate a matter if they can do so in an impartial manner. For example, a manager will not be asked to investigate any matter which relates to their own Business or Functional Unit.

Where a report of suspected unacceptable conduct directly relates to a matter involving the Chief Executive Officer or a senior manager that reports directly to the Chief Executive Officer, STOPline will refer the matter directly to the Chairman of the Board Audit and Risk Committee for attention.

## How is an investigation carried out?

The person(s) appointed to investigate the report will be required to follow normal Pacific National procedures for handling a complaint or disciplinary issue. This would normally involve:

- Undertaking a fair, independent and discreet investigation into the substance of the report to determine whether there is evidence to support the matters raised;
- Respecting individual confidentiality for both the Whistleblower and the person(s) under investigation (see below for further information on confidentiality);
- Collecting all available relevant data and seeking to verify the reported information;
- Observing the rules of natural justice and procedural fairness, including discussions with any relevant persons, affording them the opportunity to put forward any issues they wish to have considered;
- Proceeding with due care and appropriate speed; and
- Consulting or informing employee representative bodies as required.

Where the Pacific National person initiating the report has identified themselves, the investigating manager would be likely to begin by contacting that person. However, their identity would not be

made known to other parties without the specific consent of the reporting person or in the circumstances set out below.

## Outcome of Investigations

### What happens after an investigation?

At the end of the investigation, the Conduct Review Officer will report their findings to the Executive Risk Committee and to the Chief Executive Officer to determine the appropriate response. This response will include rectifying any unacceptable conduct and taking any action required to prevent any future occurrence of the same or similar conduct.

Where issues of discipline arise, the response will also be in line with Pacific National's procedures for disciplinary matters. Where allegations of unacceptable conduct made against another person cannot be substantiated, that person will be advised accordingly and will be entitled to continue in their role as if the allegations had not been made.

Where allegations of unacceptable conduct are found to have been made with malicious or vexatious intent, the response will also be in line with Pacific National's procedures for disciplinary matters.

### What if I have been involved?

A person who has committed or been involved in unacceptable conduct will not be immune from disciplinary action merely because they have reported the unacceptable conduct in accordance with this Policy. However, the person's conduct in making the report is likely to be taken into account in determining what disciplinary action is appropriate.

### Will I be kept informed?

Where the Whistleblower has chosen not to be anonymous, once the matter is completed, feedback will be provided to the Pacific National person initiating the matter. This feedback will explain the findings and actions taken to the fullest extent possible within commercial, legal and confidentiality constraints.

Where the Pacific National person initiating the matter chooses to remain anonymous, alternative arrangements will be made for providing feedback of the outcome of the investigation to that person through STOPLine.

# Protecting Confidentiality and Privacy

## Will my report be treated confidentially?

If a Pacific National person makes a report of suspected unacceptable conduct under this Policy, in good faith, Pacific National will endeavour to ensure that person's identity is protected from disclosure.

Accordingly, Pacific National will not disclose the Pacific National person's identity unless:

- The Pacific National person making the report consents to the disclosure;
- The disclosure is required by law;
- The disclosure is inferred due to the nature of a reported incident (e.g. where the Whistleblower is the only other person likely to be aware of the incident);
- the disclosure is necessary to prevent or lessen a serious threat to a person's health or safety;  
or
- It is necessary to protect or enforce Pacific National's legal rights or interests or to defend any claims.

Pacific National will also ensure that any records relating to a report of suspected unacceptable conduct are stored securely and are able to be accessed only by authorised staff.

Inappropriate disclosure of:

- The identity of an Pacific National person who has made a report of suspected unacceptable conduct;
- Information from which the identity of the reporting person could be inferred, or
- The identity of the person(s) under investigation,

(beyond the approved investigating group – see above) will be regarded as a disciplinary matter and will be dealt with in accordance with Pacific National's disciplinary procedures.

## Will I be protected if I make a report?

Pacific National is committed to protecting and respecting the legal rights of any Pacific National person who reports suspected unacceptable conduct in good faith.

Pacific National will not tolerate any reprisals, discrimination, threats, harassment, intimidation or victimisation against any person suspected of making a report of suspected unacceptable conduct, or against that person's colleagues, employer (if a contractor) or relatives. Any such retaliatory action will be treated as serious misconduct and will be dealt with in accordance with Pacific National's disciplinary procedures.

A Pacific National person who intends to make a report under this Policy may make a request via STOPline for special protection measures if their identity is likely to be readily inferred from the

nature of the information in the report. Requests will be considered taking into account both the Pacific National person's interests and those of Pacific National.

## Can I make a report anonymously?

As described above, anonymous reports of suspected inappropriate conduct may be made to STOPline. However, for an anonymous report to be investigated it must contain sufficient information to form a reasonable basis for concluding that further investigation of the matter is warranted.

To enable the obtaining or giving of further and better particulars, STOPline has a security system for anonymous callers. This will be explained to all callers in their initial conversation with STOPline.

As noted in above, there are certain statutory protections provided under the Corporations Act to persons who report suspected inappropriate conduct, provided that, the person making the report provides their name either to STOPline or Pacific National (or both).

A Pacific National person who reports their concerns to STOPline but wishes to remain anonymous to Pacific National is still entitled to rely on the statutory protection provided under the Corporations Act if they also meet the other conditions described above.

## Privacy issues

To the extent that any of the information recorded by STOPline on Pacific National's behalf constitutes "personal information" about the caller under applicable privacy laws, it should be noted that:

- The purpose of the collection of that information is to assist Pacific National to respond to issues raised by the caller and to protect or enforce Pacific National's legal rights or interests or to defend any claims;
- Personal information may be used for the primary purpose for which it was collected or for any related secondary purpose that could reasonably be expected; and
- Personal information may be disclosed as described above.

Pacific National's policy is not to collect "sensitive information" without the consent of the person to whom it relates unless the collection is required by law, is necessary to prevent or lessen a serious and imminent threat to the person's (or another person's) life or health or is necessary in relation to legal proceedings (current, anticipated or potential). "Sensitive information" means information or an opinion about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, memberships of a profession or trade, membership of a trade union, sexual preferences or practices, criminal record or health.

# Policy Review

## Reports provided under this policy

STOPline will provide reports containing a general summary of the number and type of calls made to the helpline together with a description of the nature and results of any investigation conducted as a result of a call. In the compilation of these reports the identity of any person who has made a report under this Policy in good faith or any information which may enable that person to be identified will not be disclosed.

These reports will be provided to the Conduct Review Officer, on a monthly basis.

Reports which contain a general summary of the number and type of incidents identified or complaints received through Pacific National's internal reporting processes, together with a description of the general nature and results of any investigation conducted will be provided to:

- The Executive Risk Committee , on a quarterly basis; and
- The Audit and Risk Committee, on a quarterly basis.

A consolidated report will also be provided to the above Committees each year.

In recognising the requirements of the rules of natural justice, the names of the person(s) under investigation will not be included in the reports to the above listed Committees (unless deemed appropriate by the Conduct Review Officer) until the investigation has been completed and the breach confirmed.

## Review of this policy and program

The Conduct Review Officer will use the reports provided under this Policy to monitor and review regularly the effectiveness of the programme described in this Policy.

Amendments to this Policy and/or the programme described in this Policy will be made as necessary.

## Contact Details

### Contacting the Helpline

Pacific National has outsourced the provision of a confidential hotline to STOPline.

The hotline can be contacted as follows:

By **telephone (no caller line id)**: [ph: 1300 304 550](tel:1300304550)

By **mail**: Pacific National Pty Ltd

c/o STOPline, Locked Bag 8, Hawthorn, VIC, 3122

By **confidential email**: [pacificnational@stopline.com.au](mailto:pacificnational@stopline.com.au)

## Whistleblower Contacts

The following list identifies people you may wish to contact should you not feel comfortable reporting an incident through the standard line management channels.

|   |              |                                    |                  |
|---|--------------|------------------------------------|------------------|
| <b>Chief Executive Officer</b>                        | David Irwin  | David_Irwin@pacificnational.com.au | Ph:              |
| <b>Conduct Review Officer</b><br><i>(insert role)</i> | <i>[tbc]</i> |                                    | Ph:              |
| <b>Manager Risk &amp; Internal Audit</b>              | <i>[tbc]</i> |                                    | Ph:              |
| <b>STOPline</b>                                       |              | pacificnational@stopline.com.au    | Ph: 1300 304 550 |