BOQ GROUP

WHISTLEBLOWER POLICY

Owner	General Counsel and Company Secretary
Approved	8 July 2026
Purpose	This Policy sets out BOQ's whistleblower requirements.
Scope	This Policy applies to Bank of Queensland Limited and all of its subsidiaries (collectively, "**BOQ**", "**BOQ Group**", "**Group**", "**us**", "**we**" or "**our**") and their products and services. It applies when reporting or managing Reportable Conduct.

Information Classification: Public
Bank of Queensland Limited ABN 32 009 656 740 (BOQ) AFSL and Australian Credit Licence No 244616.

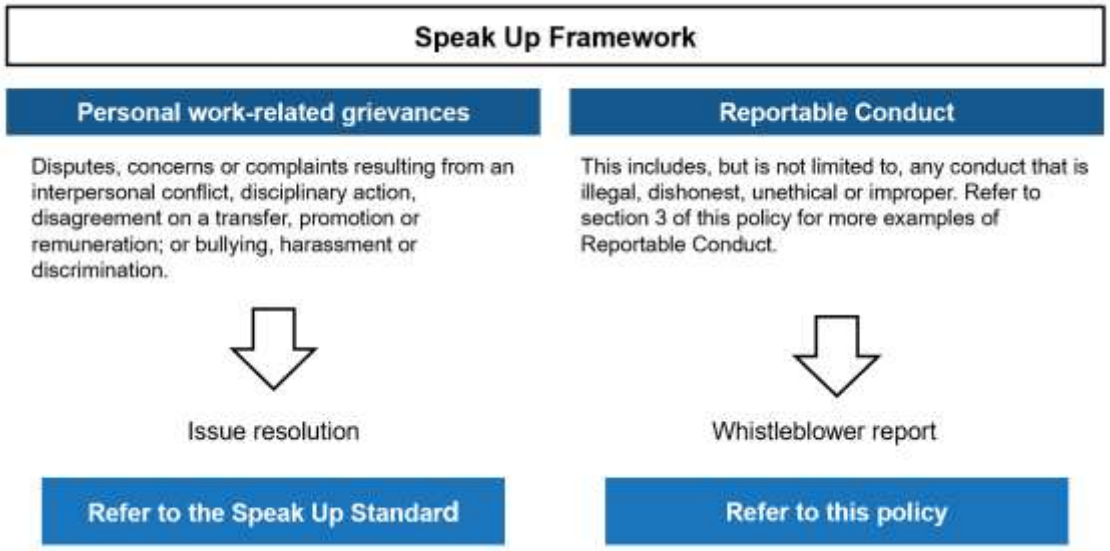
Contents

Purpose 1
Scope 1
1 Context 3
Scope 3
Purpose 3
2 Requirements 4
Process Overview 4
What is Reportable Conduct 4
Disclosing Reportable Conduct 6
Anonymity 7
Investigating Reportable Conduct 7
Protection for Whistleblowers 8
Training 10
Governance 10
Further Information 10
3 Supporting Information 10
Roles and Responsibilities 10
Definitions ..... **Error! Bookmark not defined.**
Breaches 12
Related Documents 12
Document Information 12
Version History 12
Appendix 1 – Protections Provided by Australian Law 13

1 Context

Scope

1. This Whistleblower Policy applies to reports of Reportable Conduct made by any BOQ Team Member. The Whistleblower Policy is available to any BOQ Team Member on BOQ's intranet and is publicly available on the BOQ website.
2. BOQ Team Members are the current and former officers, employees, associates and suppliers (including the supplier's employees) of BOQ. It also includes the relatives, dependents and spouses of those people and BOQ's contractors, consultants, third party providers, secondees, brokers, and auditors.
3. All BOQ Team Members are encouraged to Speak Up when they feel something isn't right. The channels through which you can make a report depends on the type of issue. Refer to the Speak Up Framework below for guidance.



Purpose

4. BOQ's Whistleblower Policy complements BOQ's Code of Conduct, which reinforces our culture of open communication, doing what is right, and encouraging and supporting BOQ Team Members to report Reportable Conduct.
5. BOQ has established this Whistleblower Policy for the following reasons:
    a. to support BOQ and BOQ Team Members to live our purpose and values;
    b. to encourage the "blame free" reporting of Reportable Conduct;
    c. to promote a healthy and balanced culture of compliance and ethical behaviour throughout BOQ;
    d. to promote a safe working environment;
    e. to reinforce BOQ's commitment to its corporate governance obligations; and
    f. to confirm BOQ's commitment to protecting whistleblowers from any detriment including retaliation, reprisal or adverse action as a result of reporting Reportable Conduct.
6. We value and encourage reports of Reportable Conduct, as they help us identify and escalate potential issues that may not otherwise be uncovered. Early detection of Reportable Conduct allows BOQ to take appropriate action that could limit harm, and safeguard BOQ and BOQ Team Members.

2 Requirements

Process Overview

7. BOQ's Whistleblower Program is BOQ's entire process for managing and responding to Whistleblower Reports and includes this Whistleblower Policy and the Whistleblower Standard. The Whistleblower Standard sets out the roles of each person involved in the Whistleblower Program. If you have a role in the Whistleblower Program, please see the Whistleblower Standard for details as to how to perform your role.
8. The process by which BOQ manages and responds to Whistleblower Reports is summarised as follows:
    a. If a Whistleblower wishes to report Reportable Conduct and have it dealt with by way of this Whistleblower Policy and the Whistleblower Standard, BOQ encourages you to make a report to either:
        i. the Whistleblower Coordinator; or
        ii. BOQ's external whistleblowing service, provided by Deloitte.
    b. A Whistleblower may also make a report to a Statutory Recipient (see Appendix 1 to this Policy).
    c. Whistleblower Reports made through any of the avenues described in paragraph 16 below will, subject to confidentiality, be referred to the Whistleblower Coordinator.
    d. The Whistleblower Coordinator will assess the Whistleblower Report. This includes determining whether the report relates to Reportable Conduct, whether legal advice is necessary, (where relevant) assigning a Whistleblower Protection Officer, and (where relevant) assigning an Investigation Lead to conduct an investigation.
    e. The Investigation Lead, who will be from Financial Crime Risk (or other internal or external team by exception), will perform an investigation. (See paragraphs 27 - 31 below).
    f. Once the investigation is completed, the Investigation Lead will provide a draft Investigation Report to the Whistleblower Coordinator who will review and finalise the Investigation Report.
    g. The Whistleblower Coordinator will then provide the Investigation Report to the Group Executive who will determine what Action Items should be taken (if any) and assign those Action Items to Action Item Owners (if and as necessary).
    h. The Board will receive:
        i. a high level, de-identified, notification of any Whistleblower Report;
        ii. updates at each Board meeting on the status of Whistleblower Reports and investigations into those reports; and
        iii. regular updates on any trends identified in Whistleblower Reports.
    i. The Whistleblower will be given feedback about the progress of their Whistleblower Report, including the outcome of any investigation, subject to any privacy, confidentiality or legal concerns. However, in some circumstances it may not be appropriate to provide details of the outcome to the Whistleblower.
    j. These updates and notifications will protect, as required, the identity of the Whistleblower.

What is Reportable Conduct

9. Reportable Conduct means any suspected or actual misconduct or improper state of affairs or circumstances in relation to BOQ and includes (but is not limited to):
    a. any conduct that is illegal, dishonest, unethical or improper;

b. breach of laws or regulations[1];

c. tax-related misconduct;

d. criminal activity;

e. bribery or corruption;

f. illegal activities (including theft, money laundering, misappropriation of funds, drug sale/use, violence, threatened violence, acts of modern slavery or criminal damage of assets/property)

g. conduct endangering health and safety or causing damage to the environment;

h. conflicts of interest;

i. anti-competitive behaviour;

j. financial fraud or mismanagement;

k. insider trading;

l. breach of trade sanctions or other trade controls;

m. unauthorised use of BOQ's confidential information;

n. conduct that represents a danger to the public or to the stability of, or confidence in, the financial system;

o. conduct giving rise to the possibility of causing financial or non-financial loss to BOQ, likely to damage the financial position or reputation of BOQ, or that might otherwise be detrimental to the interest of BOQ;

p. engaging in or threatening to engage in detrimental conduct against a person who has made, believed to have made, or may be planning to make, a disclosure; and

q. deliberate concealment of any of the above.

10. Reportable Conduct does not need to relate to a contravention of law. A breach of BOQ's Code of Conduct or other BOQ policies or standards may, at times, be Reportable Conduct and should be reported.

11. Reportable Conduct generally does not include:

    a. personal Work-related Grievances such as an interpersonal conflict between you and another Employee, a decision relating to your employment, such as an investigation into your conduct, disciplinary action (including dismissal), transfer or promotion, or a decision relating to the terms and conditions of your employment, such as your remuneration. These matters should be reported in accordance with the Speak Up Standard; or

    b. matters that may be dealt with by BOQ's customer complaints process.

12. Remember, disclosures that are not about Reportable Conduct do not quality for protection under the Corporations Act. However, a report will be dealt with and protected under this policy if it:

    a. is a mixed report that includes information about Reportable Conduct;

    b. relates to any detriment or threat to you because you previously reported Reportable Conduct;

[1] For example, a breach of laws or regulations, including an offence against, or a contravention of, the Corporations Act 2001, the ASIC Act 2001, the Banking Act 1959, the Financial Sector (Collection of Data) Act 2001, the Insurance Act 1973, the Life Insurance Act 1973, the National Consumer Credit Protection Act 2009, the Superannuation Industry (Supervision) Act 1993, or an instrument made under one of those Acts, tax laws, or an offence against any Commonwealth law punishable by imprisonment for 12 months or more.

c. relates to particular offences or breach of laws, including Employment laws, or has significant implications for BOQ; or

d. is made to an Australian-qualified lawyer to seek advice about whistleblower protections.

Disclosing Reportable Conduct

13. You can report wrongdoing using the below process if you are a:

    a. current or former employee of BOQ;

    b. current or former officer or associate;

    c. current or former supplier of goods and services to the Group (whether paid or unpaid), employee of a supplier to the Group, contractor, subcontractor, or volunteer; or

    d. relative, dependent or spouse of one of the above.

14. As a first step, BOQ Team Members are encouraged to talk to someone they're comfortable talking to.

15. If the BOQ Team Member wishes to report Reportable Conduct and have their report dealt with by way of this Whistleblower Policy and the Whistleblower Standard they are encouraged to use one of the following two options:

    a. the Whistleblower Coordinator. This can be done either by way of the Whistleblower Inbox, at Whistleblowing@boq.com.au or by contacting the Whistleblower Coordinator directly.

    b. BOQ's external whistleblowing service, provided by Deloitte. Deloitte may be contacted by one of the following methods:

        i. telephone to the disclosure hotline on 1800 945 200, available 24 hours a day, 7 days a week;

        ii. email at: BOQwhistleblowing@deloitte.com.au;

        iii. online: www.BOQwhistleblowing.deloitte.com.au

        iv. in writing to BOQ Whistleblowing Hotline, Reply Paid 12628 A'Beckett Street, Victoria 8006; or

        v. facsimile: +61 2 9255 8328

16. These channels are our core team for receiving reports and are best placed to support you and deal with your report efficiently and confidentially. We strive to identify and escalate potential issues as early as possible, and so encourage you to use one of the above options. However, BOQ Team Members may also make reports to a Statutory Recipient. To qualify for protection as a whistleblower under the Corporations Act, a discloser needs to report Reportable Conduct via one of these channels or to a Statutory recipient. Only then will the BOQ Team Member be treated as a Whistleblower and the report as a Whistleblower Report for the purpose of the Whistleblower Program.

17. We also note that:

    a. Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act are protected, even if the legal practitioner concludes that a disclosure does not relate to Reportable Conduct.

    b. Disclosures of information relating to Reportable Conduct can be made to ASIC, APRA or another Commonwealth body prescribed by regulation and qualify for protection under the Corporations Act.

    c. Disclosures can also be made to a journalist or parliamentarian under certain circumstances and qualify for protection. In these circumstances however, it is important for the BOQ team member to understand the criteria for making a public interest or emergency disclosure.

18. Regardless of which option the Whistleblower chooses, Whistleblower Reports will be referred to the Whistleblower Coordinator (subject to confidentiality). For more details on how to make a Whistleblower

Report and what information should be provided when doing so, please refer to the Whistleblower Standard. You will still be protected even if it turns out you were incorrect, however you should not make a report that you know is untrue.

19. Where your Whistleblower Report is about how your Whistleblower Report was handled or the outcome of an investigation, you should talk to the Whistleblower Coordinator or your Whistleblower Protection Officer.
20. Where this occurs, the Whistleblower Coordinator will review the investigation and consider whether it was conducted in accordance with our procedures. The Whistleblower Coordinator may at their discretion determine to reopen an investigation if they conclude further investigation is required or that new information is available.
21. Where your Whistleblower Report is about the Whistleblower Coordinator, you should make your Whistleblower Report to the Group Executive.
22. Whistleblowers may communicate with regulators at any time in relation to Reportable Conduct, including if they are not satisfied with the outcome of an investigation.

Anonymity

23. Whistleblower Reports may be made anonymously. The BOQ whistleblowing service (provided by Deloitte, see paragraph 16 above) provides for anonymous reporting. You can choose to remain anonymous, including during any investigation or after any investigation is finalised. You may also refuse to answer any questions you feel could reveal your identity.
24. A Whistleblower Report will be handled in the same way, regardless of whether it is disclosed anonymously or otherwise, and the same measures taken to protect confidentiality will apply.
25. BOQ's Whistleblower Program instils the key principles of confidentiality and not causing detriment to Whistleblowers, and is designed to minimise the sharing of a Whistleblower's identity. Whistleblowers are encouraged to provide their name as this will make it easier for BOQ to ask for further information, and we ask that you at least provide us a way to contact you. Without sufficient information BOQ may be unable to effectively investigate a Whistleblower Report. Further, BOQ may be in a better position to offer practical support where BOQ knows the Whistleblower's identity, (for example, by assigning a Whistleblower Protection Officer).

Investigating Reportable Conduct

26. The investigation process is generally as follows:
    a. The Whistleblower Coordinator will assess Whistleblower Reports and determine if they relate to Reportable Conduct and whether a formal investigation is appropriate. Where it is determined that the report does relate to Reportable Conduct (i.e. that it is a Whistleblower Report) and that it is appropriate to conduct a formal investigation, the Whistleblower Coordinator will assign an Investigation Lead to conduct the investigation. The Investigation Lead will be a member of Financial Crime Risk (or another internal or external team by exception).
    b. If the Whistleblower Report relates to key management personnel (being those persons having authority and responsibility for planning, directing and controlling the activities of the BOQ Group, directly or indirectly, including any director (whether executive or not) of BOQ) the Whistleblower Coordinator will, prior to initiating an investigation, consult with the Chair of the BOQ Risk Committee (or, if the Whistleblower Report relates to the Chair of the BOQ Risk Committee, to the Chair of the BOQ Audit Committee).
    c. The Investigation Lead will conduct the investigation in accordance with the Whistleblower Standard. Investigations will be fair and independent from any persons to whom the Whistleblower Report relates. All investigations will be conducted in a manner that is devoid of bias or prejudice against the Whistleblower or any person against whom an allegation is made. While the scope and timeframe for any investigation differs depending on the report being examined, investigations will be conducted in a timely manner. All BOQ Team Members must cooperate fully with any investigation.

d. BOQ will treat the person or persons to whom the Whistleblower Report relates fairly and any findings will be made on reliable evidence. The Investigation Lead will prepare a draft Investigation Report, which will be provided to the Whistleblower Coordinator. The method for documenting and reporting the findings will depend on the nature of the Whistleblower Report. The Whistleblower Coordinator will review the Investigation Report to promote consistency in approach and outcomes.

e. The Whistleblower Coordinator will provide the Investigation Report to the relevant Group Executive. The Group Executive will determine what (if any) Action Items are required and will assign those Action Items to Action Item Owners (if and as required).

f. Whistleblowers will be given feedback about the progress of their Whistleblower Report, including the outcome of any investigation, subject to any privacy, confidentiality or legal concerns. However, the timing of feedback and level of detail we can provide will depend on the nature of the Whistleblower Report. In some circumstances it may not be appropriate to provide details of the outcome to the Whistleblower.

g. The Whistleblower Coordinator will monitor the progress of any investigation. The Whistleblower Coordinator will (subject to confidentiality) provide monthly updates to the Board on the progress of investigations and will provide regular data to the CRO for the purpose of trend reporting.

27. We may be unable to investigate your report (or practically limited in what we can do) if we cannot contact you or you do not agree to allowing an investigator to contact you. Without your agreement, where the protections apply, we cannot share your identity, and we can only share information in your report to the extent identifying information has been removed and it is reasonably necessary for the investigation.

28. As a result, it is important for you to assist us by sharing your identity (so we can contact you) and allow us to share your identify for any investigation. Otherwise, we may be unable to effectively investigate and deal with the Reportable Conduct.

29. Please note that the frequency and timeframe of updates may vary depending on the nature of the disclosure. We will strive to keep you informed during key stages of the investigation process, such as when the investigation process has begun, while the investigation is in progress, and after the investigation has been finalised.

30. At the end of the investigation, we will provide you with a summary of the findings, subject to any privacy, confidentiality or legal concerns. However, the method for documenting and reporting the findings will depend on the nature of the report. In some circumstances, it may not be appropriate to provide details of the outcome to the Whistleblower.

Protection for Whistleblowers

31. BOQ is committed to protecting:

    a. the confidential information of Whistleblowers, including their identity; and

    b. Whistleblowers from any detriment, including for example retaliation, reprisal, discrimination, causing physical or psychological harm, damaging property, harassment, victimisation or adverse action, as a result of making a Whistleblower Report. Detriment does not include action taken to manage unsatisfactory work performance.

32. All Whistleblowers who make a Whistleblower Report will be protected. BOQ offers each Whistleblower a Whistleblower Protection Officer, where required. Where one is appointed, the Whistleblower Protection Officer will be responsible for ensuring that this protection is provided. Where a Whistleblower Protection Officer is not appointed, the Whistleblower Coordinator will be responsible for ensuring that this protection is provided.

33. Your identity will be kept confidential to the fullest extent possible and only shared as permitted by you or by law (see Appendix 1 for details). Examples of how we protect confidentiality include:

    a. limiting both how your identity and information that may lead to your identification is shared;

b. keeping information relating to your disclosure in a secure location and limiting access to the same;

c. potentially using a pseudonym to refer to you;

d. providing training to the people involved in the Whistleblower Program in relation to their obligations; and

e. requiring people involved in the Whistleblower Program to act in accordance with the Whistleblower Standard.

34. No person may victimise, retaliate against or cause detriment to someone else (or threaten to do so) because of a belief that that person has made or will make a Whistleblower Report. BOQ will not tolerate retaliation or causing detriment in this way against a Whistleblower or against a person who may make a Whistleblower Report (or any member of the investigation team). Disciplinary action may be taken against any person who engages in such conduct.

35. Retaliation or causing detriment in this way is Reportable Conduct. If the Whistleblower has suffered any such detriment or has any concerns in relation to the progress of an investigation or how it is conducted, they may contact the Whistleblower Coordinator or the Whistleblower Protection Officer (where one has been assigned).

36. Examples of steps we may take to protect you from detriment as we consider appropriate in the circumstances include:

    a. assigning a Whistleblower Protection Officer to the Whistleblower;

    b. monitoring and managing the behaviour of other employees;

    c. relocating employees (which may include the people alleged to have been involved in the Reportable Conduct) to a different division, group or office;

    d. offering a leave of absence or flexible workplace arrangements while a matter is investigated; and

    e. requiring people involved in the Whistleblower Program to act in accordance with the Whistleblower Standard.

37. Support is also available to BOQ Team Members, including employees within BOQ's Owner Manager network, under the Employee Assistance Program.

38. While all reasonable steps will be taken to protect Whistleblowers, BOQ is not able to provide the same level of protection to Whistleblowers who are not directly employed by the BOQ Group at the time of the Whistleblower Report, including former employees and external third parties.

39. BOQ will focus on the quality of the information concerning the Reportable Conduct, not the motivation of the Whistleblowers.

40. Each disclosure will be assessed and may be the subject of an investigation. The objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported. When an investigation needs to be undertaken, the process will be objective, fair, and independent. An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken. An employee who is the subject of a disclosure may contact the entity's support services (e.g. counselling).

41. For more information about the protections available to Whistleblowers (including positive actions that Whistleblowers can seek from BOQ to provide them with protection and support) see Appendix 1 to this Whistleblower Policy and the Whistleblower Standard. If you believe one of these protections has been breached, you should make a report by way of paragraph 16.

Training

42. The Whistleblower Co-ordinator will ensure that this Whistleblower Policy is published on the BOQ website and take reasonable steps to ensure that employees are aware of, and understand, the Whistleblower Policy and the types of behaviour or scenarios that are reportable, including through induction procedures and training. People & Culture will also provide training to BOQ employees or officers involved in handling Whistleblower Reports about this Whistleblower Policy and how to handle and respond to Whistleblower Reports.
43. Any Whistleblower Report will be retained in BOQ's confidential Whistleblower Register, maintained by the Whistleblower Coordinator, for no less than 7 years.

Governance

44. BOQ's Whistleblower Program will be reviewed annually by the General and Company Secretary to ensure that it remains effective and relevant to BOQ and that it continues to comply with relevant laws.
45. The Board is responsible for the overall governance of BOQ's Whistleblower Program. The Board, through the Chairman, will hold the CRO accountable for the implementation and effectiveness of the program as "Executive Champion".
46. The Whistleblower Coordinator will provide monthly updates to the Board on the status of Whistleblower Reports and investigations into those reports (including updates on material incidents reported under this Whistleblower Policy).

Further Information

47. Any questions about this Policy, including questions about making a report, should be referred to the Whistleblower Coordinator.
48. This Policy does not form part of terms of employment and may be amended from time to time.

3 Supporting Information

Roles and Responsibilities

The following table outlines the roles and responsibilities relating to this Policy.

Role	Responsibility
Board	- Governing BOQ's Whistleblower Program - Receiving reporting about Whistleblower reports
Chief Risk Officer	- Championing the Whistleblower Program
Investigation Lead	- Investigating Whistleblower Reports - Providing Investigation Reports to the Whistleblower Coordinator
Whistleblower Coordinator	- Assessing Whistleblower Reports and determining whether they relate to Reportable Conduct - Monitoring Progress of Investigations - Reporting to the CRO and Board on Whistleblower matters
Whistleblower Protection Officer	- Protecting Whistleblowers from detriment

Definitions

49. The following table defines key terms used in this Policy.

Term	Definition
Action Item	The steps decided to be taken by a Group Executive following receipt of an Investigation Report.
Action Item Owner	The person that the Group Executive assigns as the person responsible for completing a particular Action Item.
BOQ Team Member	Has the meaning given in paragraph 2.
Group Executive	A member of the Group Executive Team.
Investigation Lead	The person from the Investigation Leads assigned that role in relation to the particular Whistleblower Report.
Investigation Leads	Those persons appointed to that role by the Whistleblower Co-ordinator.
Investigation Report	A report prepared by the Investigation Lead summarising the findings and recommendations arising from the investigation.
Personal Work-related Grievances	Grievances relating solely to an individual's current or former employment that have implications for the individual personally, and is not Reportable Conduct or a Detriment Report. Examples include: interpersonal conflicts between two employees or a promotion outcome decision, a decision relating to individual's engagement, transfer or promotion, a decision relating to the terms and conditions of the individual's engagement, or a decision or to suspend or terminate the individual's engagement or to discipline the individual.
Recipient	Variously the Whistleblower Coordinator, the external whistleblowing service provided by Deloitte or a Statutory Recipient when receiving or dealing with a Whistleblower Report.
Reportable Conduct	Has the meaning given in paragraph 10.
Statutory Recipient	Means any of the persons listed in Appendix 1
Whistleblower	A person who has made, proposes to make or could make a Whistleblower Report.
Whistleblower Coordinator	The General Counsel & Company Secretary and/or the Head of Disputes, Regulatory Investigations & Litigation.
Whistleblower Program	BOQ's processes for managing and responding to Whistleblower Reports, and includes the Whistleblower Policy and the Whistleblower Standard.
Whistleblower Protection Officer	The person from the Whistleblower Protection Officers assigned that role in relation to the particular Whistleblower.
Whistleblower Protection Officers	Those persons appointed to that role by the CPO.
Whistleblower Register	The confidential register of Whistleblower Reports maintained by, and accessible only by, the Whistleblower Coordinator.
Whistleblower Report	A report of Reportable Conduct made pursuant to the Whistleblower Policy.

Breaches

50. Suspected or actual breaches of this Policy must be reported to the Document Owner and managed according to BOQ's issue, risk event, and consequence management processes.

Related Documents

51. The following documents relate to this Policy:
    a. Whistleblower Standard
    b. Speak Up Standard
    c. Code of Conduct
    d. Harassment Discrimination and Bullying Standard
    e. Workplace Health & Safety Policy
    f. Anti-Money Laundering and Counter-Terrorism Policies
    g. Employee Due Diligence Policy
    h. Conflict of Interest Policy
    i. Acceptable Use Policy
    j. Group Financial Crimes Policy
    k. Securities Trading Policy

Document Information

Approver	Board
Approved on	08 July 2026
Document Owner	General Counsel and Company Secretary
Accountable Group Executive	Chief Risk Officer
Document Level	Board Policy
Information Classification	Public
Relevant Legislation (incl. Prudential Standards)	Corporations Act 2001 (Cth)
Risk Class(es)	Compliance and Conduct
Review Frequency	Annual
Next scheduled review date	Determined by current approval date and review frequency.
Transition Period	N/A

Version History

Version	Date	Author	Description
13.0	Jul 2026	Company Secretary	Annual Review and update
12.0	Jul 2025	Company Secretary	Annual Review and update

11.0	Jul 2023	Company Secretary	Annual Review and update.
10.0	Jun 2022	Board	Updating Whistleblower Hotline details and review of content update.
9.0 – 1.0	Dec 2021 and prior	Board	Historical updates.

Appendix 1 – Protections Provided by Australian Law

When do the legal protections apply?

To qualify for protection under the Corporations Act or the Tax Administration Act, BOQ Team Members must report Reportable Conduct directly to a Recipient.[2] Anonymous reports can be protected.

The protections do not apply to reports that are not about Reportable Conduct, such as Personal Work-related Grievances

Who are Statutory Recipients?

Statutory Recipients are persons who can receive disclosures that qualify for legal protection. We encourage BOQ Team Members to make your report through the Whistleblower Coordinator or BOQ's external whistleblowing service. However, BOQ Team Members can also make a report to one of the following:

- a director, officer or senior manager of BOQ;
- an internal or external auditor, or a member of an audit team conducting an audit, of BOQ;
- an actuary of BOQ; or
- in relation to a tax related matter, BOQ's officers or employees with tax duties, or our registered tax agents or BAS agents;
- an Australian-qualified lawyer, for the purpose of obtaining legal advice about whistleblower provisions or legal representation in relation to your Whistleblower Report (in which case the report will be protected even if the matter turns out not to be Reportable Conduct); or
- ASIC, the Registrar as appointed under the Corporations Act, APRA, or (for a tax related matter) the ATO.

In limited circumstances, certain "public interest" or "emergency" reports can be made to a member of Commonwealth Parliament or a journalist and be protected by law. If you are seeking to make such a report, it is important you understand the criteria that must be met, which include:

- that a report to ASIC or APRA has already been made;
- (in the case of a "public interest" report) at least 90 days have passed and you have reasonable grounds to believe that no action is being take, or (in the case of an "emergency" report) you have reasonable grounds to believe the report concerns a substantial and imminent danger to health, safety or the environment; and
- you give the body you made the report to written notice that you intend to make a "public interest" or "emergency" report.

You may wish to contact a lawyer about whether the criteria have been met prior to making such a report.

What are the legal protections?

[2] Reports that do not qualify for protection under these Acts may qualify for protection under other legislation.

The protections outlined below apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Corporations Act.

Your identity is protected: It is illegal to share your identity, or disclose information that is likely to lead to your identification unless permitted by you or by law.

The law allows your identity to be shared in limited circumstances, namely with your consent or to ASIC, the Registrar as appointed under the Corporations Act, APRA, a member of the Australian Federal Police, or to an Australian-qualified lawyer to seek advice about whistleblower laws. The law also allows information in your report to be shared where reasonably necessary for an investigation and reasonable steps are taken to reduce the risk of you being identified.

Compensation and other remedies: If you suffer loss, damage or injury because you made or plan to make a report and BOQ has failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct, you may seek compensation or other remedies through the courts.

Detriment and reprisals: It is illegal for someone to cause or threaten detriment to you because they believe or suspect that you have made, may have made, or could report Reportable Conduct.

Other protections: You are protected from civil, criminal or administrative legal action being taken against you because you made a report. This means legal or disciplinary action cannot be taken against you for breach of your employment contract, breaching confidentiality or unlawfully releasing information because you made a report. Information you disclose cannot be used in a prosecution against you (other than for giving false information).

However, you will not have immunity from liability or disciplinary action for any misconduct you have engaged in.

What should I do if a protection is breached?

BOQ takes any breach of the protections described in this Policy seriously.

Where you believe such a breach has occurred, you should either talk to your Whistleblower Protection Officer, the Whistleblower Coordinator or make a Whistleblower Report. You can also contact a regulator such as ASIC, APRA or the ATO, or you may wish to contact a lawyer.

REMEMBER

The Whistleblower Coordinator is here to help you. You can contact them directly by way of the Whistleblower Inbox: Whistleblowing@boq.com.au