Our Whistleblower Policy



Suncorp Group Limited
ABN 66 145 290 124

Fostering a culture of honest and ethical behaviour.

SUNCORP

Suncorp is committed to fostering a culture of honest and ethical behaviour, supporting you to speak up and report any issues.

The Whistleblower Policy is designed to help you speak up confidentially where you suspect or observe behaviour that is illegal, dishonest or a breach of law (i.e. about Reportable Conduct), if you are not able to raise the issue with your leader or leader once removed for any reason.

Policy Statements

Suncorp is committed to supporting and protecting Disclosers, and demonstrates this by doing the following:

- ✓ Providing appropriate channels to support the raising of Reportable Conduct.
- ✓ Taking reasonable steps to protect and support a Person who raises Reportable Conduct.
- ✓ Maintaining the confidentiality, anonymity and privacy of the Person raising Reportable Conduct and securely storing all records.
- ✓ Ensuring that all Whistleblower investigations are conducted fairly, objectively, without bias and in a timely manner.
- ✓ Maintaining appropriate governance and reporting procedures for Whistleblower matters.

Refer Key Terms for definitions used within this Policy.

1. What's in scope

Everyone is encouraged to speak up and report any issues to Suncorp, however not everyone or all types of issues are intended to be covered by this Policy.

Who does it apply to?

✓ Person(s), as defined in the Key Terms. This includes any current or former:

- Officer, Employee, External Worker, Auditor, Work Experience Participant, Supplier, employee of a Supplier or associate of Suncorp; and
- Relative, dependent or spouse of someone referred to above.

What types of issues can be reported?

✓ Reportable Conduct, as defined in the Key Terms.

If you are unsure about whether your concern relates to Reportable Conduct, you can contact the Whistleblower Protection Officer at whistleblowerоffice@suncorp.com.au for guidance or seek independent legal advice.

What is not covered by this Policy?

✓ A Personal Work-Related Grievance, as defined in the Key Terms. If you wish to report this type of issue, refer to the Complaints and Investigations Guideline (AU and NZ) or seek advice from the Employee Council (AU only). Former employees can contact People Connect on 1800 188 833 (AU) or 09 352 7885 (NZ).

✓ Customer complaints. Refer to the Complaints Management Policy (AU) or Complaints (NZ) on how to lodge a customer complaint.

2. Ways to report a concern

To receive protections under this Policy and the Law, you must report your concerns about Reportable Conduct via one of the following confidential channels. We recommend that you make your report to the Hotline or via the Website.

Suncorp Whistleblower Service (24-hour service managed by Deloitte)

You can report your concerns in your chosen language and this will be translated to English, or you can request an interpreter when calling the hotline. If you require any other accessibility support, please make this known when you contact Deloitte.

- ✓ Hotline (AU): 1800 444 774
- ✓ Hotline (NZ): 0800 425 047
- ✓ Outside of AU or NZ: +61 3 9667 3727 (International call rates apply)
- ✓ Website: https://australia.deloitte-halo.com/whistleblower/website/Suncorp
- ✓ Email: suncorp@deloittedigital.com
- ✓ Post (AU): Reply Paid 12628 A'Beckett Street, Melbourne, VIC 8006
- ✓ Post (NZ): PO BOX 912028 Victoria Street West, Auckland 1142 New Zealand

Whistleblower Protection Officer

- ✓ CRO Special Projects

Other Eligible Recipients

We recommend that you make your report directly with the Suncorp Whistleblower Service, however you may raise your concerns with other Suncorp Eligible Recipients. If these people receive your report directly, they are required to handle it in accordance with this Policy.

All reports that may be assessed as Reportable Conduct received directly by these people will be referred to the Whistleblower Protection Officer unless there are exceptional circumstances or you have requested otherwise.

- ✓ Member of the Executive Leadership Team (ELT)
- ✓ Head of Tax (for tax affairs)
- ✓ Executive General Manager Internal Audit
- ✓ Suncorp Appointed Actuary
- ✓ Manager Group Internal Fraud
- ✓ A Director of the Board
- ✓ External Auditor of Suncorp

Other external channels

The Law provides other external channels to report. These are outlined in **Appendix 1**.

Making a report

- ✓ You may report anonymously or use a pseudonym. If you do make an anonymous report, you are encouraged to maintain ongoing communication using your preferred reporting channel, to enable Suncorp to ask follow-up questions and better understand your concerns. The Whistleblower Investigation Officer may not be able to undertake an investigation if they are unable to contact you.
- ✓ You are not required to prove the allegation. Protections can still apply if your report turns out to be incorrect. However, you must not deliberately make a report that you know to be untrue.

3. What happens after you make a report

Whistleblower Protection Officer's assessment

When you make a report in accordance with section 2 of this Policy, the Whistleblower Protection Officer will:

- ✓ Assess if your report is a Disclosure.
- ✓ If required, seek further information to better understand the issue and determine whether it is appropriate and possible to investigate.
- ✓ Assess whether you or anyone else mentioned in the report is at risk of Detrimental Conduct or Retaliatory Action.
- ✓ Provide you with acknowledgement of the report.

This assessment is usually completed within seven (7) calendar days.

If your report is not assessed as a Disclosure

- ✓ The Whistleblower Protection Officer will notify you of the reason for this assessment and other ways to report the issue.
- ✓ If your report is a Personal Work-Related Grievance, the Whistleblower Protection Officer will refer it to the People Team for actioning in accordance with the relevant internal processes. Unless you provide consent, you will remain anonymous.

4. How Suncorp will protect and support you

If you are a Discloser, Suncorp will take all reasonable steps to maintain your confidentiality and protect you.

These steps may include:

- ✓ Restricting the number of people who are made aware of your identity for the purpose of handling and investigating your Disclosure (where we have your consent to disclose your identity).
- ✓ Redacting personal or identifying information.
- ✓ Storing electronic material related to your Disclosure securely and using secure channels of communication for handling and investigating your Disclosure.
- ✓ Limiting access to information relating to your Disclosure to only those directly involved in handling and investigating your Disclosure.
- ✓ Providing awareness training to those involved in an investigation to ensure they understand their obligations in relation to maintaining confidentiality.
- ✓ Permanently deidentifying or deleting any of your personal information seven (7) years after a Disclosure is made or investigation closed (whichever is later), unless otherwise required.
- ✓ Providing support services via the Employee Council (AU only) and Employee Assistance Program (AU and NZ) for Employees.
- ✓ The Whistleblower Protection Officer taking appropriate action to protect you from Detrimental Conduct or Retaliatory Action, as defined in the Key Terms.

Additional protections may apply under the Law. These are outlined in **Appendix 1**. If you believe your confidentiality has been breached, you may escalate internally to the Whistleblower Protection Officer or the Whistleblower Executive Champion. Other external complaint channels are outlined in **Appendix 1**.

5. How will Suncorp investigate Disclosures

Investigation process

- ✓ For all Disclosures, Suncorp will appoint a Whistleblower Investigation Officer whose role is to determine whether there is enough evidence to substantiate or refute the allegations, applying a fair and objective process.
- ✓ If your report is about a matter that has already been formally and appropriately investigated, the Whistleblower Investigation Officer will assess your report to determine if further investigation is necessary.
- ✓ The investigation process, including its expected timeframe, may vary depending on the nature of, and information provided within, your Disclosure and Suncorp's ability to contact you. While the Complaints & Investigation Guideline (Guideline) does not apply to investigations of Disclosures, investigation principles from this Guideline may be considered. Providing as much information as possible in your report will assist with the investigation.
- ✓ During the investigation, Suncorp may need to disclose information likely to identify you where it is reasonably necessary for the purposes of an investigation and where reasonable steps have been taken to protect your identity and notify you.
- ✓ At any point during the investigation you may escalate to the Whistleblower Protection Officer or the Whistleblower Executive Champion if you believe appropriate action is not being taken.

Keeping you informed

- ✓ The Whistleblower Protection Officer will keep you informed of the investigation process, if you can be contacted. The regularity of the updates will depend on the nature of the Disclosure.

If you are the subject of a Disclosure

- ✓ Suncorp will take reasonable steps to maintain your confidentiality; and
- ✓ Provide you with a right of response before any adverse findings of fact are made against you in an investigation.

Investigation outcome

- ✓ As the Discloser, you will usually be informed of the outcome of the investigation, subject to any confidentiality constraints. There may however be circumstances where it is not appropriate to provide details of the outcome of the investigation to you.
- ✓ Depending on the investigation findings, the Whistleblower Protection Officer and/or the People team will engage relevant leaders to commence any necessary management action. The Whistleblower Protection Officer may request that the relevant leaders provide updates as required on the status of the management actions, however, is not accountable for ensuring matters are appropriately rectified.

6. Roles and responsibilities

The Whistleblower Protection Officer is responsible for:

- ✓ Periodically reviewing and updating this Policy and implementing changes.
- ✓ Providing confidential guidance to Disclosers on how the Policy works.
- ✓ Conducting the assessment process outlined in section 3.
- ✓ Enabling the investigation of Disclosures, including ensuring that the Whistleblower Investigation Officer is sufficiently independent.
- ✓ Appropriately responding to any potential for conflict of interest raised by the Whistleblower Investigation Officer.
- ✓ Protecting Disclosers and ensuring the integrity of the reporting mechanism.
- ✓ Supporting training, education and communications about the Policy.
- ✓ Reporting on trends and providing a summary of all Disclosures to the Board while maintaining your confidentiality.

The Whistleblower Investigation Officer must:

- ✓ Be sufficiently independent in consideration of the nature of the Disclosure.
- ✓ Have the necessary skills and expertise to investigate the allegations in a confidential and timely manner.
- ✓ Advise the Whistleblower Protection Officer immediately if there is potential for a conflict of interest.

The Whistleblower Executive Champion is the Chief Risk Officer (or delegate) and is responsible for:

- ✓ Responding to escalations, including in relation to any potential conflict of interest, and acting as an executive sponsor.
- ✓ Monitoring the overall effectiveness of the Whistleblower Policy.

More information

Making the Policy available

This Policy is published on the Suncorp Group public website and internal intranet.

Suncorp builds awareness about this Policy internally via communications and mandatory training on the Policy and Suncorp Whistleblower Service as part of web-based learning modules.

Internal reporting

Any specific issue or insight from a Disclosure that can be shared while maintaining your confidentiality will be provided to the Whistleblower Executive Champion, the Board and any other relevant audience as agreed. Findings will be utilised to continuously improve processes, procedures, and culture.

Policy Exemptions

No exemptions apply to this Policy.

Policy Breaches

All Policy breaches must be recorded in IRIIS, Suncorp's risk and compliance management system, in accordance with the Incident Management Standard, with the Policy Owner notified. Non-compliance with this Policy may result in disciplinary action (including termination of employment).

Approver: Board. Owner: Chief Risk Officer.
Effective Date: August 2006. Last Reviewed: October 2025. Review Frequency: 2 years.

Key Terms (Definitions)

Authorised Representative	A person or company authorised in accordance with section 916A or 916B of the *Corporations Act 2001* (Cth) to provide a financial service or financial services on behalf of the holder of an AFSL.
Board	The Board of Directors of Suncorp Group Limited, another Main Board Entity or a NZ entity.
Consultant	A firm or company engaged to provide recommendations or specialised advice to assist decision making by Suncorp. Payment is on the provision of a deliverable or staged as agreed.
Contractor	Expert individuals engaged (through a Service Provider) to deliver a defined task that is reliant on the individual's skills and expertise. Deliverables must be defined, but payment may be determined against time worked.
Detrimental Conduct	Conduct that results in detriment, including any of the following: – Dismissal of an employee; – Injury of an employee in their employment; – Alteration of an employee's position or duties to their disadvantage; – Discrimination between employees of the same employer; – Harassment or intimidation of a person; – Harm or injury to a person, including psychological harm; – Damage to a person's property; – Damage to a person's reputation; – Damage to a person's business or financial position; or – Any other damage to a person.

	Detrimental Conduct does not include: – Any performance management activity that is instigated due to unsatisfactory work performance, that is conducted in accordance with Suncorp's performance management processes; or – Any action taken that has been done for the purpose of protecting the Discloser from detriment e.g. moving the Discloser from their immediate work environment. In the event that administrative or management action is taken which impacts the Discloser, Suncorp will ensure that the Discloser understands the reason for such action. This definition only applies in relation to Disclosures in Australia.
Discloser ("you")	A Person who makes a report which is deemed a Disclosure, as defined in the Key Terms.
Disclosure	A report which the Whistleblower Protection Officer determines will be managed under this Policy, on the basis that: – The report is made by a Person, as defined in the Key Terms; – The report is made in accordance with section 2; and – The allegations contained in the report are considered by the Whistleblower Protection Officer to constitute Reportable Conduct, as defined in the Key Terms.
Employee	Includes all full-time, part-time, fixed-term, maximum-term and casual employees of the employing entities of Suncorp and does not include External Workers.
External Worker	A person who is engaged to perform certain services but who is not employed by Suncorp, including but not limited to: – Authorised Representative; – Consultant; – Contractor; or – Service Provider's employees.
Law	The Corporations Act 2001 (Cth), Protected Disclosures (Protection of Whistleblowers) Act 2022 (New Zealand) or Taxation Administration Act

	1953 (Cth), as applicable in the circumstances.
Officer	Has the meaning set out in section 9 of the *Corporations Act 2001* (Cth). This includes the following: – A director or secretary of the corporation. – A person: – Who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the corporation; or – Who has the capacity to affect significantly the corporation's financial standing; or – In accordance with whose instructions or wishes the directors of the corporation are accustomed to act (excluding advice given by the person in the proper performance of functions attaching to the person's professional capacity or their business relationship with the directors or the corporation).
Person ("you")	Any current or former: – Officer, Employee, External Worker, Auditor, Work Experience Participant, Supplier, employee of a Supplier or associate (within the meaning set out in the Corporations Act 2001 (Cth) or the Income Tax Assessment Act 1936 (Cth)) of Suncorp; and – Relatives of someone referred to above, or a dependent of someone referred to above or that Person's spouse. Note, to the extent that this Policy imposes obligations on Suncorp, it does not form a contractual term, condition or representation and may be amended from time to time.
Personal Work-Related Grievance	A concern related to your employment, or former employment, which could have implications for you, but no significant implications for Suncorp. Examples of a Personal Work-Related Grievance include: – Interpersonal conflict; – Complaint about a performance or reward review outcome; – Grievance about a recruitment decision including engagement, transfer or promotion; – Complaint about any disciplinary action taken or proposed to be taken

	against you; – Decision regarding terms and conditions of employment; or – Other matters that do not breach workplace laws. However, a Personal Work-Related Grievance may be reported under this Policy (and may qualify for protection under the Law) if: – It is accompanied by information about Reportable Conduct (i.e. a mixed report); – It includes information about a practice or behaviour of concern that has significant implications for Suncorp, or is otherwise a breach of law; or – You have suffered from or are threatened with Detrimental Conduct or Retaliatory Action.
Reportable Conduct	In relation to Suncorp, or an officer or employee of Suncorp, information about: – Illegal conduct, such as theft, dealing in or use of illicit drugs, violence or threatened violence, criminal damage against property, fraud, money laundering or misappropriation of funds, offering or accepting a bribe, or any other offence punishable by imprisonment for a period of 12 months or more; – Modern slavery and related human rights breaches; – Financial irregularities; – Failure to comply with, or breach of, legal or regulatory requirements; – Engaging in or threatening to engage in Detrimental Conduct or Retaliatory Action against a person who has made a report under this Policy or is believed or suspected to have made, or be planning to make, a report under this Policy; – Conduct that indicates a significant or serious risk to health or safety; – Conduct that represents a danger to the public or the financial system, even if it does not involve a breach of a particular law; – Conduct, deliberate or otherwise, that may cause material financial or non-financial loss to Suncorp or otherwise be materially detrimental to the interests of Suncorp including tax affairs; or – Any other conduct that constitutes misconduct or an improper state of

	affairs or circumstances. A report of the conduct above will only constitute Reportable Conduct where there are reasonable grounds for the Discloser to suspect that the conduct has occurred.
Retaliatory Action	Action made against a Discloser by an Employee, Officer or External Worker of Suncorp that may give rise to a personal grievance or unjustifiable dismissal claim. Examples include victimisation, harassment, intimidation, discrimination, demotion, dismissal and current/future bias. This definition only applies in relation to Disclosures in New Zealand.
Service Provider	A firm or company (including related bodies corporate) who provides outsourced services defined by deliverables or service level agreements.
Suncorp (“we”/”us”/”our”)	Suncorp Group Limited and its Related Bodies Corporate in Australia and New Zealand.
Supplier	A firm or company who has entered into a relationship with Suncorp for the purpose of providing goods and/or services.

Appendix 1: Protections under the Law

Application of the Law

- Suncorp will apply the standards set out in this Policy. Some aspects of this Policy may be broader than the protections available under the Law.
- While some guidance can be provided by Suncorp's Whistleblower Service (Deloitte) and the Whistleblower Protection Officer, Suncorp is unable to advise you on how the Law will apply to your specific circumstances.
- If you require further information on the application of the Law, please seek independent legal advice. In New Zealand, you can also seek advice from the Ombudsman.
- Whistleblowing information by ASIC, APRA and the ATO is available online, such as the ASIC Information Sheet 239 How ASIC handles whistleblower reports (INFO 239).

Protections under the Law in New Zealand

- Under the Protected Disclosures (Protection of Whistleblowers) Act 2022 (New Zealand), protections apply to 'disclosers' who make 'protected disclosures' about 'serious wrongdoing'. Note: Reportable Conduct, as defined in the Key Terms, covers 'serious wrongdoing' under the Protected Disclosures (Protection of Whistleblowers) Act 2022 (New Zealand).
- Under the Protected Disclosures (Protection of Whistleblowers) Act 2022 (New Zealand), in certain circumstances, a 'protected disclosure' can be reported directly to an 'appropriate authority', Minister of the Crown or an Ombudsman.

Qualifying for protection under the Law in Australia

- Under the Corporations Act 2001 (Cth) and Taxation Administration Act 1953 (Cth), an individual who makes a disclosure of information is known as a 'discloser'. **Note**: the term 'discloser' under the Corporations Act 2001 (Cth) and Taxation Administration Act 1953 (Cth) does not have the same meaning as Discloser in the Key Terms.

- A 'discloser' will only qualify for protection under the Corporations Act 2001 (Cth) or the Taxation Administration Act 1953 (Cth) if they meet three criteria:

    1. The 'discloser' is an 'eligible whistleblower'. **Note:** the term 'eligible whistleblower' under the Corporations Act 2001 (Cth) and Taxation Administration Act 1953 (Cth) has the same meaning as Person in the Key Terms;

    2. The 'discloser' is disclosing information relating to a 'disclosable matter' under the Corporations Act 2001 (Cth) or 'tax affairs' under the Taxation Administration Act 1953 (Cth). **Note**: Reportable Conduct, as defined in the Key Terms, covers 'disclosable matters' under the Corporations Act 2001 (Cth) and 'tax affairs' under the Taxation Administration Act 1953 (Cth); and

    3. The 'discloser' has made their disclosure:

        a) Directly to the Suncorp Whistleblower Program or Suncorp Eligible Recipient, outlined in section 2 of this Policy, or any other eligible recipient under the Corporations Act 2001 (Cth);

        b) To ASIC, APRA, the ATO or another Commonwealth body prescribed by regulation;

        c) To a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act 2001 (Cth) (even if the legal practitioner concludes that a disclosure does not relate to a 'disclosable matter') or the Taxation Administration Act 1953 (Cth); or

        d) To journalists and members of Commonwealth, state or territory parliamentarians, under certain circumstances. It is important that 'disclosers' understand the criteria for making a public interest or emergency disclosure under the Corporations Act 2001 (Cth). 'Disclosers' should obtain independent legal advice prior to making this type of report. 'Disclosers' must have previously disclosed the information to ASIC, APRA or a prescribed body and notified that body that they intend to make a public interest or emergency disclosure. In

the case of a public interest disclosure, at least 90 days must have passed since the 'discloser' disclosed the information to ASIC, APRA or a prescribed body.

- Disclosures that are not about 'disclosable matters' do not qualify for protection under the Corporations Act 2001 (Cth) (or the Taxation Administration Act 1953 (Cth), where relevant).
- Disclosures that relate solely to 'personal work-related grievances', and that do not relate to detriment or threat of detriment to the 'discloser', do not qualify for protection under the Corporations Act 2001 (Cth). Note: the term 'personal work-related grievances' under the Corporations Act 2001 (Cth) has the same meaning as Personal Work-Related Grievance in the Key Terms of this Policy.

Confidentiality protections under the Law in Australia

If a 'discloser' qualifies for protection under the Corporations Act 2001 (Cth), Suncorp has the following legal obligations under the Corporations Act 2001 (Cth) and Taxation Administration Act 1953 (Cth) to protect their confidentiality:

- A person cannot disclose the identity of a 'discloser' or information that is likely to lead to the identification of the 'discloser' (which they have obtained directly or indirectly because the 'discloser' made a disclosure that qualifies for protection). There are two exceptions:
    1. If a person discloses the identity of the 'discloser':
        a) To ASIC, APRA a member of the Australian Federal Police (within the meaning of the Australian Federal Police Act 1979 (Cth)) or the Commissioner of Taxation (in relation to tax affairs);
        b) To a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act 2001 (Cth));
        c) To a person or body prescribed by regulations; or
        d) With the consent of the 'discloser'.
    2. If a person discloses information contained in a disclosure, with or without the consent of the 'discloser', in circumstances where:
        a) The information does not include the identity of the 'discloser';
        b) Suncorp entity has taken all reasonable steps to reduce the risk that the 'discloser' will be identified from the information; and

c) It is reasonably necessary for investigating the issues raised in the disclosure.

- Outside of these exceptions, it is illegal for a person to identify a 'discloser' or 'disclose' information that is likely to lead to the identification of the 'discloser' and unauthorized disclosure of the identity of a 'discloser' may be a criminal offence.
- A 'discloser' may lodge a complaint about breach of confidentiality with a regulator, such as ASIC, APRA or the ATO, for investigation.
- These protections apply to any disclosures that are made in accordance with the Corporations Act 2001 (Cth) i.e. internal disclosures, disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures.

Protection from detriment under the Law in Australia

- **Note**: the term 'detriment' under the Corporations Act 2001 (Cth) and Taxation Administration Act 1953 (Cth) has the same meaning as Detrimental Conduct in the Key Terms.
- If a 'discloser' qualifies for protection under the Corporations Act 2001 (Cth), Suncorp has the following legal obligations under the Corporations Act 2001 (Cth) and Taxation Administration Act 1953 (Cth) to protect them from detriment:
  - A person cannot engage in conduct that causes detriment to a 'discloser' (or another person), in relation to a disclosure, if:
    - The person believes or suspects that the 'discloser' (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; and
    - The belief or suspicion is the reason, or part of the reason, for the conduct.
  - A person cannot make a threat to cause detriment to a 'discloser' (or another person) in relation to a disclosure. A threat may be express or implied, or conditional or unconditional. A 'discloser' (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.
- Causing detriment to a 'discloser' (or another person) in relation to a disclosure may be a criminal offence.
- A 'discloser' may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if they believe they have suffered detriment.

- These protections apply to any disclosures that are made in accordance with the Corporations Act 2001 (Cth) i.e. internal disclosures, disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures.

Compensation and other remedies in Australia

- If a 'discloser' qualifies for protection under the Corporations Act 2001 (Cth), the 'discloser' (or any other employee or person) can seek compensation and other remedies through the courts if:
  - They suffer loss, damage or injury because of a disclosure; and
  - Suncorp failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.
- You are encouraged to seek independent legal advice in relation to this remedy.

Civil, criminal and administrative liability protection in Australia

- If a 'discloser' qualifies for protection under the Corporations Act 2001 (Cth), the 'discloser' is protected from any of the following in relation to their disclosure:
  - Civil liability (e.g. any legal action against the 'discloser' for breach of an employment contract, duty of confidentiality or another contractual obligation);
  - Criminal liability (e.g. attempted prosecution of the 'discloser' for unlawfully releasing information, or other use of the disclosure against the 'discloser' in a prosecution (other than for making a false discloser)); and
  - Administrative liability (e.g. disciplinary action for making the discloser).
- The protections do not grant immunity for any misconduct a 'discloser' has engaged in that is revealed in their discloser.