

Whistleblower Policy – Australia

Policy Owner: Global Human Resources

Date of Revision: November 2025

Policy Effective Date

January 2020

Policy Implementation Date

January 2020

Policy Statement

State Street encourages the disclosure of wrongdoing. At the core of a strong culture is the willingness of people to raise concerns and the willingness of management to listen and, when necessary, take action and protect those raising concerns.

This policy is provided in support of State Street's *Speak Up* culture and recognises its legal and regulatory obligations in Australia. It establishes the minimum standards for the identification and management of disclosures.

State Street employees in Australia are required to adhere to this policy, and most specifically are responsible for protecting the identity of a Whistleblower where they choose to remain anonymous.

Scope

This policy applies to Eligible Whistleblowers in respect of protected whistleblower disclosures regarding the following legal entities in Australia (each a **Regulated Entity**):

- State Street Services Australia Pty Ltd (SSSAPL)

- State Street Australia Ltd (SSAL)
- State Street Bank & Trust Company (includes activities in Australia conducted in the name of SSBT, SSGMIL, SSGLAP, SSGM LLC)
- State Street Bank & Trust Company Sydney Branch (SSBT Sydney Branch)
- State Street Capital Pty Limited (SSCPL)
- State Street Global Advisors Australia Limited (SSGA AL)
- State Street Global Advisors Australia Services Limited (SSGA ASL)
- Charles River Development Inc. (CRD)

Policy Details

1. Who is an Eligible Whistleblower?

An **Eligible Whistleblower** is an individual who is, or has been, any of the following in relation to a Regulated Entity.

- an officer or employee (e.g. current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers, and directors);
- a supplier of services or goods (whether paid or unpaid), including their employees (e.g. current and former contractors, consultants, service providers and business partners);
- an associate; and
- a relative, dependent or spouse of an individual stated in (a) to (c) above (e.g. relatives, dependents or spouse of current and former employees, contractors, consultants, service providers, suppliers and business partners).

2. Qualifying for Protection under the Corporations Act

An Eligible Whistleblower qualifies for protection under the Corporations Act if:

- they have made a disclosure of information relating to a **Disclosable Matter** directly to an **Eligible Recipient** or to ASIC, APRA or another Commonwealth body prescribed by regulation;
- they have made a disclosure 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; or
- they have made an 'emergency disclosure' or 'public interest disclosure'.

Protection applies from the time a disclosure is made, regardless of whether the Eligible Whistleblower or recipient recognises that the disclosure qualifies for protection.

The Taxation Administration Act also provides protections in relation to disclosures about a breach of an Australian tax law by a Regulated Entity (**Tax Disclosures**), as set out in the “Tax Whistleblowers” section below.

Disclosures that are not about Disclosable Matters do not qualify for protection under the Corporations Act or the Taxation Administration Act.

3. Disclosable Matters

Protections apply to disclosures of information where an Eligible Whistleblower has reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances, in relation to any Regulated Entity or one of its related bodies corporate.

Disclosable Matters include (but are not limited to) any actual or suspected offences or contraventions of:

- the Corporations Act,
- the ASIC Act 2001,
- the Banking Act 1959;
- the Financial Sector (Collection of Data) Act 2001;
- an instrument made under an Act mentioned above;
- any other law of the Commonwealth that is punishable by imprisonment for 12 months or more;

Disclosable Matters include but are not limited to:

- conduct that is fraudulent, corrupt, dishonest or illegal;
- misleading or deceptive conduct;
- conduct which may represent a danger to the public or the financial system; and
- other conduct that may cause financial or non-financial loss to the Regulated Entity.

Examples of Disclosable Matters include theft, dealing in, or use of illicit drugs, fraud, money laundering or misappropriation of funds, offering or accepting a bribe.

4. Personal work-related grievances

Personal work-related grievances are excluded from whistleblowing protections (subject to exceptions); however they can still be reported through the *Speak Up Line* for review. An example of a personal work related-grievance would be a concern that *"My manager told me I have to work on a public holiday and I don't want to work that day"*, or *"My manager has told me my performance is unsatisfactory, but I disagree."*

Exceptions

A personal work-related grievance may qualify for whistleblowing protection if it:

- a) includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (e.g. a mixed report);
- b) relates to information that suggests misconduct beyond the discloser's personal circumstances;
- c) concerns an allegation that the discloser is suffering from or has been threatened with detriment for making a protected disclosure; or
- d) relates to the discloser seeking legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

A Whistleblower may be subject to a disciplinary action if found to have knowingly made a false report or disclosure.

5. Who Can Receive A Disclosure?

State Street's ***Speak Up Line*** (a confidential third-party resource owned by Global Human Resources) is an Eligible Recipient that can receive disclosures on behalf of its Australian legal entities. This service:

- can act as an intermediary between the Whistleblower and the entity including for the Whistleblower to obtain additional information
- enables disclosures to be made:
 - anonymously;
 - confidentially; and
 - outside of business hours;
- more easily enables disclosers to retain their anonymity while allowing us to ask for additional information; and
- enables disclosers to receive updates on the status of their disclosure while retaining anonymity, using their unique key and password to follow up questions and obtain updates.

Additionally, disclosures can be made directly to:

- (a) an officer (includes a director or company secretary)
- (b) a senior manager (as defined by the Corporations Act)
- (c) the internal or external auditor (including a member of an audit team) conducting an audit
- (d) ASIC, APRA (re potential breaches of the laws administered by these regulators), or another Commonwealth body prescribed by regulation
- (e) 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
- (f) the Taxation Commissioner in relation to a Tax Disclosure where it may assist in the performance of the Taxation Commissioner's functions or duties, or
- (g) to a journalist or parliamentarian under certain circumstances (see *Criteria for Public Interest Disclosures and Emergency Disclosures*) as follows:

i. *Criteria for Public Interest Disclosures*

- the Whistleblower has previously made a disclosure of the information to ASIC, APRA or a prescribed Commonwealth authority (***the recipient authority***);
- 90 days have passed since the previous disclosure was made;
- the Whistleblower has reasonable grounds to believe action has not been taken and further disclosure of information would be in the public interest; and
- before making the public interest disclosure, the Whistleblower has given written notice to the recipient authority that received the previous disclosure that they intend to make a public interest disclosure, including sufficient information to identify the previous disclosure.

ii. *Criteria for Emergency Disclosures*

- the Whistleblower has previously made a disclosure of the information to ASIC, APRA or a prescribed Commonwealth authority (***the recipient authority***);
- the Whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or environment;
- before making the emergency disclosure, the Whistleblower has given written notice to the recipient authority that received the previous disclosure that they intend to make an emergency disclosure, including sufficient information to identify the previous disclosure; and

- where the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

Before making a public interest or emergency disclosure, A Whistleblower should seek independent legal advice to ensure they understand the criteria for making such disclosures and understand their legal protections.

6. Tax Whistleblowers

There are additional protections under the Taxation Administration Act for Eligible Whistleblowers who make a disclosure to an Eligible Recipient with reasonable grounds to suspect that it relates to misconduct or an improper state of affairs or circumstances in relation to the tax affairs of a Regulated Entity or an associate. The Eligible Whistleblower must also consider that the information may assist the Eligible Recipient in performing functions or duties relating to those tax affairs.

For further information about the protections under the tax whistleblower regime, see the Australian Taxation Office's webpage on [tax whistleblowers](#).

7. How to Make A Disclosure

Disclosure can be made via State Street's *Speak Up Line* by any of the following methods:

- Via the portal or telephone via this link
<https://secure.ethicspoint.com/domain/media/en/gui/55139/index.html>
- Mail: ATTN: State Street, 5500 Meadows Road, Suite 500, Lake Oswego, OR 97035 USA

Where a disclosure is made directly to other Eligible Recipients (See "Who Can Receive a Disclosure" above), disclosures can be made either in person, mail, email or telephone.

8. Anonymous disclosures

Individuals are protected under the Corporations Act even if they elect to remain anonymous, while making a disclosure, over the course of the investigation and after the investigation is finalised. A Whistleblower can refuse to answer questions they feel could reveal their identity at any time, including during follow-up conversations. Whistleblowers wishing to remain anonymous should maintain ongoing two-way communication with State Street for follow-up questions or providing feedback.

State Street's *Speak Up Line* is designed to facilitate this process on an anonymous basis. Additional measures adopted by State Street to protect anonymity are outlined in the "*Protection from detrimental acts or omissions*" "Support and Practical Protection for Whistleblowers" sections below.

9. Legal Protections for Whistleblowers

The following protections are available to Eligible Whistleblowers who qualify for protection (see section "Qualifying for Protection under the Corporations Act"): :

- protection from detrimental acts or omissions
- identity protection (confidentiality)
- compensation and remedies
- civil, criminal and administrative liability protection

A Whistleblower can still qualify for protection even if their disclosure turns out to be incorrect.

Protection from detrimental acts or omissions

State Street will take all reasonable steps to protect Whistleblowers from detriment and actions it considers appropriate where any actual or threatened conduct is identified. State Street prohibits any actual or threatened conduct that could cause a detriment to a Whistleblowers because the Whistleblower is believed or suspected of making or proposing to make a disclosure, including:

- dismissal of an employee;
- injury of an employee in his or her employment;
- alteration of an employee's position or duties to his or her disadvantage;
- discrimination between an employee and other 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.

Whistleblowers should immediately inform an Eligible Recipient if they are concerned that:

- they may be, are being, or have been subjected to the inappropriate conduct referenced above;
- or

- their disclosure has not been dealt with in accordance with this policy, including any assessment made by the Speak Up Line.

Examples of actions that are not considered detrimental conduct:

- administrative action that is reasonable for the purpose of protecting a - Whistleblower from detriment (e.g. moving a Whistleblower who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
- managing a Whistleblower's unsatisfactory work performance, if the action is in line with the entity's performance management framework.

Depending on the nature of the disclosure, the Lead Investigator will undertake an assessment as to what actions will need to be taken to protect a Whistleblower from detrimental acts or omissions. These could include:

- assessing the risk of detriment against a Whistleblower and other persons based on the nature of the disclosure
- allocate a code name to the Whistleblower for internal use
- consider the perceived number of individuals the information could have potentially come from plus how important the allegation is
- offer counselling support and strategies to help manage the stress of the Whistleblower e.g. set up a feedback process
- depending on the circumstances, the Whistleblower may need to be removed from the physical location they normally work in e.g. be allowed to take extended leave or perform their duties from another location
- other staff involved in the disclosure may need to be reassigned, relocated or put on leave
- ensure all parties involved in the case are aware of their responsibilities to maintain the confidentiality of the Whistleblower and keep records secure
- ensure fairness when managing the performance of, or taking other management action relating to, a Whistleblower
- if detriment has already occurred address the detrimental conduct, such as by taking disciplinary action

A Whistleblower may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if they believe they have suffered detriment.

10. Identity protection (confidentiality)

A person cannot, without the Eligible Whistleblower's consent, disclose the identity of an Eligible Whistleblower or information that is likely to lead to the identification of the Eligible Whistleblower. Disclosing identifying information about an Eligible Whistleblower is a criminal offence and can attract hefty penalties (*see Appendix - Penalties*), both for the organisation and the individual.

Unless an exemption applies (see below) the Eligible Whistleblower's identity (including details likely to lead to their identification e.g. color of skin, hair and department) as well as the Disclosable Matter must be kept confidential. In circumstances where, for any reason, the identity of the Whistleblower is known outside of the investigation process, State Street will take reasonable steps to protect the Whistleblower from retaliatory or discriminatory action where it has sufficient authority to do so. State Street has no power to offer any person immunity against prosecution in the criminal jurisdiction or from any civil action which may be brought against the Whistleblower.

Exceptions:

1. The identity of the Whistleblower can be disclosed:
 - a) to ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the Australian Federal Police Act 1979) (or the Taxation Commissioner regarding tax matters);
 - b) to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act);
 - c) to a person or body prescribed by regulations; or
 - d) with the consent of the Whistleblower.
2. The information contained in a disclosure can be disclosed, with or without the Whistleblower's consent, only if:
 - a) the information does not include the Whistleblower's identity;
 - b) the entity has taken all reasonable steps to reduce the risk that the Whistleblower will be identified from the information; and
 - c) it is reasonably necessary for investigating the issues raised in the disclosure.

All information received from a Whistleblower must be treated confidentially and sensitively. State Street will use and disclose such information as reasonably required for the purpose of investigating a protected disclosure and for any required internal governance purposes but will ensure that the information is handled in accordance with the protocols set out in this policy.

In the case of information likely to identify an individual (as opposed to the individual's identity), if it is reasonably necessary to share the information for the purposes of an investigation, all reasonable steps will be taken to reduce the risk that the individual will be identified.

Due to the sensitivity of the information, any leaks or unauthorised disclosure may have adverse consequences for the Whistleblowers, the individuals who are the subject of disclosures and the legal entity.

11. Compensation and Remedies

A Whistleblower (or any other employee or person) can seek compensation and other remedies through the courts if:

- a) they suffer loss, damage or injury because of a disclosure; and
- b) State Street failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Whistleblowers should seek their own independent legal advice.

12. Civil, criminal and administrative liability protection

A Whistleblower is protected from any of the following in relation to their protected disclosure:

- a) civil liability (e.g. any legal action against the Whistleblower for breach of an employment contract, duty of confidentiality or another contractual obligation);
- b) criminal liability (e.g. attempted prosecution of the Whistleblower for unlawfully releasing information, or other use of the disclosure against the Whistleblower in a prosecution (other than for making a false disclosure)); and
- c) administrative liability (e.g. disciplinary action for making the disclosure).

The protections do not grant immunity for any misconduct a Whistleblower has engaged in that is revealed in their disclosure.

13. Support and Practical Protection for Whistleblowers

Depending on the nature of the disclosure the Lead Investigator will assess what precautions should be taken to minimise the risk that the Whistleblower will be identified from the information provided. This could include;

- all personal information or reference to the Whistleblower witnessing an event be redacted;

- the Whistleblower will be referred to in a gender-neutral context;
- where possible, the Whistleblower will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them
- disclosures will be handled and investigated by qualified staff.
- all records relating to disclosures will be stored securely (paper/electronic)
- access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of an Whistleblower's identity (subject to the Whistleblower's consent) or information that is likely to lead to the identification of the Whistleblower;
- communications and documents relating to the investigation of a disclosure will not to be sent to an email address or to a printer that can be accessed by other staff; and
- each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a Whistleblower's identity may be a criminal offence

Employees or family members may access State Street's confidential counselling service, Optum's *Employee Assistance Plan*, for support by calling 1300 678 861 or +613 9658 0041 if calling from outside Australia.

14. Handling and Investigating Disclosure

In the first instance a *Lead Investigator* will be appointed. A determination will then be made by that individual, or equivalent body e.g. external legal counsel, as to whether the disclosure falls within the intended scope of this policy. Whilst not all disclosures will necessarily lead to an investigation, they will be assessed, and a decision made as to whether they should be investigated. For example, they may have already been investigated and a decision is taken not to institute a new investigation.

State Street's response will vary depending on the nature of the disclosure (including the amount of information provided). The Eligible Recipient will advise the Whistleblower of the decision whether to investigate, unless they have no means to contact that individual. **State Street may not be able to undertake an investigation if it is not able to contact the Whistleblower.**

State Street will adopt principles of procedural fairness to the conduct of any investigation and resultant findings arising under this Policy referencing *State Street Corporation Legal Division's Guidelines for Conducting Internal Investigations* where not in conflict with the Corporations Act. To ensure fairness

and independence, investigations will be independent of the Whistleblower, the individuals who are the subject of the disclosure, the department, and where practical, the business unit involved.

If a disclosure falls within the intended scope of this policy the Lead Investigator will determine an appropriate plan of action referencing the below where applicable:

- Where legally permitted interview the person the disclosure is concerning.
- Assess the risk of detriment to the Whistleblower, or another person in relation to a disclosure, and put in place steps to protect their identity.
- Define the scope of the investigation and where possible validate that with the Whistleblower.
- Assess the nature of any technical, financial or legal advice that may be required to support the investigation.
- Determine the person(s) within and/or outside the entity that will need to be involved (Whistleblower Investigation Team – **WIT**).
- Identify roles and responsibilities of participants, and any conflicts of interest.
- Decide the timeframe for the investigation, targeting two weeks unless the case is complicated.
- Adhere to protocols for maintaining the confidentiality of materials and communications relating to the investigation (received and gathered).
- Consider whether any reporting under applicable anti-money laundering laws or other laws and regulations in the jurisdictions in which State Street is organized, and operates in, is required.
- Impartially conduct or commission an investigation, gathering evidence and documents as appropriate.
- Ensure all relevant records (paper and electronic) are kept secured.
- Evaluate the evidence and make a recommendation as to further actions.
- Take action and consider if there is a need to refer to the Police or regulators.
- Keep the Eligible Recipient involved as they may be in further contact with the Whistleblower about the outcome of the investigation.

Investigations will be conducted in as timely a manner as the circumstances allow and be independent of the person(s) about whom a disclosure has been made. Provided there are no restrictions or other reasons for doing so, persons against whom a disclosure has been made will be informed and have an opportunity to respond. To protect a Whistleblower's identity from being revealed and protect them from detriment, the WIT may investigate a disclosure by conducting a broader review on the subject matter or the work area disclosed to mask the area of focus. This type of approach can impact the investigative timeline.

State Street employees involved in the process must remain impartial, refrain from taking sides, playing judge or jury, or making assumptions based on personal opinions, or expressing their personal thoughts to the Whistleblower.

Depending on the nature of the disclosure the Lead Investigator will decide as to how best to document and report on the case, while preserving confidentiality. This would include whether the legal entity Board need to be notified e.g. in the case of serious misconduct, while maintaining the confidentiality of any anonymous Whistleblower.

Where there is a line of communication available with the Whistleblower State Street will provide notification of the closure of the investigation to them. This may not contain the specifics of the actions taken.

State Street may be required to refer an allegation to the Police or other regulators such as ASIC or APRA. In such circumstances, State Street may not be able to keep a Whistleblower informed on the progress of a protected disclosure.

15. Whistleblower Complaints

Should a Whistleblower disagree with the outcome of an investigation they can request a case review. State Street is not obliged to reopen an investigation and can conclude a review if it finds that the investigation was conducted properly unless new information is presented/discovered that requires further investigation.

A Whistleblower can lodge a complaint with State Street about a breach of confidentiality. They may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO, for investigation.

16. Fair Treatment of Individuals Mentioned in A Disclosure

During any investigation under this Policy, the party mentioned in the Disclosure will be treated fairly throughout the investigation. Where legally permissible, and where it won't compromise the effectiveness of the investigation, they 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. They will be provided with fair warning of an investigative interview and provided with an opportunity to have a support person present for emotional support. They will be given an opportunity to respond to any disclosure. They will also have access to the Counselling option under Support.

17. Accessibility of Policy

This policy is available to State Street personnel on the Corporate Policy Centre on Collaborate.

It is also publicly available on State Street's external website.

Key Term Definitions and Acronyms

APRA	Australian Prudential Regulation Authority
ASIC	Australian Securities and Investments Commission. Information on how ASIC handle Whistleblower Reports can be found here .
ATO	Australian Taxation Office
Disclosable Matter	Information to which the whistleblower protections apply
Eligible Recipient	An individual who can receive a disclosure that qualifies for the whistleblower protections
Eligible Whistleblower	An individual to whom the whistleblower protections can apply
emergency disclosure	The disclosure of information to a journalist or parliamentarian, where the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment. The disclosure must meet several other criteria to qualify
journalist	Has the meaning given in s1317AAD (3) of the Corporations Act
misconduct	Includes fraud, negligence, default, breach of trust and breach of duty
public interest disclosure	The disclosure of information to a journalist or a parliamentarian, where the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest. The disclosure must meet several other criteria to qualify
senior manager	Has the meaning given in the Corporations Act
Whistleblower	An Eligible Whistleblower who has made a disclosure that qualifies for protection under the Corporations Act

Related Policies, Standards and Guidance

- Anti-Bribery and Corruption Policy – Global
- State Street Speak Up Line
- Anti-Retaliation Policy
- Open Door Policy
- Bullying and Harassment Policy
- Code of Ethics
- Standard of Conduct
- Confidentiality Policy
- Fraud Risk Management Policy

Policy Administration

Global Human Resources is responsible for interpretation and administration of this Policy. Any changes to, or exceptions from, this Policy require prior approval of Global Human Resources.

Review and Approvals

Global Human Resources is responsible for review and revision of this Policy. It is then reviewed by Corporate Compliance before being tabled at the SSSAPL and SSGA Board meetings for approval. This policy is subject to periodic legal review. This Policy is subject to review on an annual basis, or otherwise as needed.

Enforcement and Audit

Compliance with this Policy, and any related procedure, may be reviewed by State Street at any time. Failure to comply with this Policy, as well as any associated procedures, may result in disciplinary action in accordance with the Conduct Standards Policy – Global.

Revision and Approval History

Revision Date	Policy Owner	Document Revision Description	Approvals
November 2023	GHR	No changes	SSSAPL & SSGA Boards to note there were no changes to the policy in the Board meeting minutes.
November 2024	GHR	No material changes	SSSAPL & SSGA Boards to note there were no changes to the policy in the Board meeting minutes.
November 2025	GHR	Updated eligible recipients	SSSAPL (13/11/25) & SSGA Boards to note there were no changes to the policy in the Board meeting minutes.

Appendix 1 – Penalties

There are three key areas of conduct that will attract penalties if breached:

1. Detrimental conduct – this is conduct that causes any detriment to a person and includes making threats to cause any detriment to that person. ‘Detriment’ is defined very broadly to include dismissal, victimising, alteration to position, discrimination, harassment, injury in employment or damage to reputation.
2. Confidentiality – the identity of a Whistleblower must be kept confidential.
3. Failure to have a compliant whistleblower policy

Breach of conduct	Criminal penalties	Civil penalties
Engaging in detrimental conduct	<ul style="list-style-type: none"> For an individual – \$50,400 (240 penalty units) or imprisonment for 2 years or both. For a body corporate – \$504,000 (2400 penalty units). 	<ul style="list-style-type: none"> For an individual – \$1,050,000 (5000 penalty points) or 3 times the benefit derived, or detriment avoided. For a body corporate – \$10,500,000 50,000 penalty points, 3 times the benefit derived, or detriment avoided or 10% of the body corporate’s annual turnover (up to \$525m, 2.5m penalty units).
Breaching anonymity	<ul style="list-style-type: none"> For an individual – \$12,600 (60 penalty units) or imprisonment for 6 months or both. For a body corporate – \$126,000 (600 penalty units). 	<ul style="list-style-type: none"> For an individual – \$1,050,000 (5000 penalty points) or 3 times the benefit derived, or detriment avoided. For a body corporate – \$10,500,000 50,000 penalty points, 3 times the benefit derived, or detriment avoided or 10% of the body corporate’s annual turnover (up to \$525m, 2.5m penalty units).
Failure to have compliant	<ul style="list-style-type: none"> For an individual – \$12,600 (60 penalty units). 	<ul style="list-style-type: none"> N/A

Breach of conduct	Criminal penalties	Civil penalties
whistleblower policy	<ul style="list-style-type: none">For a body corporate – \$126,000 (600 penalty units)	

End of Record