

# Domestic and General Services Pty. Ltd (DGSP) & Domestic and General Insurance Plc (DGIA)

## Whistleblower Policy

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<b>Document Change Control</b>			
<i>Section Amended</i>	<i>Amend Description</i>	<i>Date of Amendment</i>	<i>Version Update</i>
S 3 'Application of Policy'	Additional application of the Policy	20 April 2016	V2.0
S 5 'Contact Officer'	Spelling correction	20 April 2016	V2.0
S1 'Purpose of Policy'	Policy link amendment	October 2017	V3.0
S 4 'Reporting Conduct'	UK Legal contact updated	October 2017	V3.0
S 5 'Contact officer'	Point of contact updated	October 2017	V3.0
S 10.1 Raising issues...	Point of contact updated	January 2018	V4.0
All sections of Policy	Updated from just a DGSP policy to DGSP & DGIA	November 2019	V5.0
S1 'Purpose of Policy' & S2 'Reportable Conduct'	Policy link amendment. Created new section 'S2 Reportable conduct' & added 'tax laws, ASIC laws and APRA laws' to the list as per new legislation	November 2019	V5.0
S 5 'Application of Policy'	Amended eligible whistleblowers to include former employees, contractors etc as well as spouses and relatives as per new legislation. Added the lines 'All disclosures will be treated consistently and fairly' and 'Where an anonymous disclosure is made....' And 'You must not threaten...'	November 2019	V5.0

S 11 'Non-compliance with Policy'	Added aims of policy	November 2019	V5.0
S 7 'Contact Officer' & 'Protection Officer'	Removed contact officer (Ross Littlewood) & protection officer (Marco Del Din) as now have a generic email whistleblowing@recenter.com.au	November 2019	V5.0
S 9 Grievances	Added examples of work-related grievances	November 2019	V5.0
S 3 Protected Disclosure	Defined a Protected Disclosure and elements of anonymity	November 2019	V5.0
S 13 13. How the Policy is made available, trained and reviewed	Section added to comply with new legislation	November 2019	V5.0

## 1. Purpose of Policy

Domestic & General Services Pty Ltd (**DGSP**) and Domestic & General Insurance Plc (**DGIA**) are committed to a culture of corporate compliance with laws and to ensuring ethical behaviour, in keeping with its values of working to the highest levels of integrity.

DGSP/DGIA will ensure that all employees and others relevantly associated with DGSP/DGIA are made aware of this Policy and receive appropriate training and education on whistleblowing and will regularly review this Policy to ensure its effectiveness.

## 2. Reportable Conduct

You may make a report or disclosure under this policy if you have reasonable grounds to believe that a Company director, officer, employee, contractor, supplier, consultant or other person who has (current or past) business dealings with the Company has engaged in conduct (**'Reportable Conduct'**) which is:

- Dishonest, fraudulent or corrupt;
- Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property);
- In breach of Commonwealth or state legislation or local by-laws, tax laws, ASIC laws or APRA laws
- Unethical including any breach of the Company's policies such as the Code of Conduct;
- Oppressive or grossly negligent;
- Potentially damaging to the Company, its employees or a third party;
- Misconduct or an improper state of affairs;
- A danger, or represents a danger to the public or financial system;
- Harassment, discrimination, victimisation or bullying.

### 3. Protected Disclosure

You may make a report or disclosure (**'Protected Disclosure'**) on the basis that your identity will remain anonymous to the wider organisation; DGSP/DGIA will take steps necessary in order to respect this. The only persons who will know your identity will be the person you reported to, the external person in charge of the investigation (**'Contact Officer'**) and an external person assigned specifically to safeguard your rights, interests and anonymity as a Whistleblower (**'Protection Officer'**).

Where an anonymous disclosure is made, proper investigation may be more difficult or impossible if DGSP/DGIA cannot obtain further information from the whistleblower. It may also be more difficult to establish whether any allegations are credible or provide feedback.

The identity and any information that may identify the Whistleblower must not be released to any person who is not involved in the investigation or the resolution of the matter, which is the subject of the report by the Whistleblower.

A person that receives information from a Whistleblower must not release this information without authority to do so to any person not involved in the investigation or the resolution of the matter.

You must not threaten, retaliate against or otherwise victimise whistleblowers in any way. If you are involved in such conduct, you will be subject to disciplinary action.

### 4. Statement of Policy

This Policy provides an avenue to raise concerns within DGSP/DGIA that Reportable Conduct has occurred. The purpose of the Policy is to encourage the reporting or "whistleblowing" of Reportable Conduct.

"Whistleblowing" is when a Staff Member at DGSP/DGIA attempts to make or makes a report in connection with conduct that the person believes in good faith is Reportable Conduct.

Raising concerns about Reportable Conduct is both important and beneficial to DGSP/DGIA as it promotes compliance with laws and ethical behaviour.

DGSP/DGIA are committed to protect and respect Whistleblowers. If you raise a genuine concern about Reportable Conduct in good faith under this Whistleblower Policy:

- You will not be personally disadvantaged by having made the report by dismissal, demotion, any form of harassment, discrimination or current or future bias, against you or your colleagues or relatives; and
- Your concern will be investigated thoroughly, promptly and confidentially and you will receive feedback at the end of the investigation, subject to any privacy considerations with respect to the person(s) against whom the allegations are made or others.

If you purport to be a Whistleblower and make a false or malicious claim, you may be disciplined under DGSP/DGIA's Disciplinary Procedure, and in serious cases this could lead to dismissal. However, if a claim is made in good faith and the Whistleblower has not engaged in Reportable Conduct, the Whistleblower will be immune from disciplinary proceedings for making the report.

## 5. Application of Policy

This Policy applies to:

- Anyone who conducts work (or has *in the past* conducted work) for DGSP/DGIA in any capacity, whether this is full-time, part-time or casual, including temporary and contract workers. This includes contractors & employees of contractors e.g. Repair Agents and their employees.
- Spouses and relatives of the above.

This Policy also applies to the Contact Officer and Protection Officer<sup>1</sup> who will confirm in writing that all reports from Whistleblowers will be kept confidential and secure.

You do not need proof or evidence that the Reportable Conduct has happened. A genuinely held reasonable belief is sufficient. All Protected Disclosures will be treated consistently and fairly.

You should report conduct even if you do not believe the persons that engaged in the conduct has been dishonest or intentionally acted improperly. For example, if you believe that a person has misled a consumer you should report this conduct.

The Reportable Conduct may be something that you know or believe has already happened, or that you know, or think is likely to happen in the future.

## 6. Reporting Conduct:

You should report any conduct that you consider amounts to Reportable Conduct as a Protected Disclosure. A Protected Disclosure can be made through three avenues ('Eligible Recipients'):

1. To a Senior Manager (i.e. a member of the Leadership Team), who will become the Contact Officer.
2. Directly to the external Contact Officer at [whistleblowing@recenter.com.au](mailto:whistleblowing@recenter.com.au)
3. To the D&G Group Whistleblowing team at [whistleblower@domesticandgeneral.com](mailto:whistleblower@domesticandgeneral.com). This team is based in the UK and consists of the Chief Risk Officer (CRO), the Head of Employee Relations and the Group General Counsel.

Any other party would not be considered an Eligible Recipient and the disclosure would not be protected by this policy.

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<sup>1</sup> Contact Officer and Protection Officer service provided by ReCentre (Littlewoods)

## **7. Contact Officer**

An Eligible Recipient that receives a Protected Disclosure is known as the Conduct Officer. The role of the Contact Officer is to investigate the substance of the report to determine whether there is evidence to support or refute the complaint of Reportable Conduct. The Contact Officer will:

- Investigate reports in a fair and impartial manner and, to the extent possible, not take any action until all relevant information has been collected and considered;
- Conduct their investigation without bias against the person against whom the allegation is made and give that person the right to respond to any complaint;
- Take steps to protect the confidentiality of information provided by the Whistleblower;
- Keep details of any Reportable Conduct confidential and limit discussion of information received from a Whistleblower to those with a valid role to play in the investigation, unless otherwise required by law or written consent has been received from the Whistleblower.

## **8. Protection Officer**

Upon receiving a Protected Disclosure, the Contact Officer assigns a Protection Officer. The role of the Protection Officer is to safeguard the interests of the Whistleblower and protect the Whistleblower from victimisation following the making of a report of conduct that is Reportable Conduct (e.g. by ensuring that the Whistleblower does not suffer personal disadvantage as a result of making a report of Reportable Conduct).

## **9. The difference between a grievance and whistleblowing**

A grievance is an issue that concerns you personally that does not amount to Reportable Conduct, Examples include:

- An interpersonal conflict between the staff member and another employee;
- A decision relating to the engagement, transfer or promotion of the staff member;
- A decision relating to the terms and conditions of engagement of the staff member;
- A decision to suspend or terminate the engagement of the staff member, or otherwise to discipline the staff member.

## **10. The Investigation**

Following a report by a Whistleblower the Contact Officer will consider whether it should be investigated, and if so, will investigate it as soon as practicable. This investigation will be conducted promptly, impartially and confidentially in accordance with the roles and responsibilities of the Contact Officer and Protection Officer.

To the extent practicable in all the circumstances, DGSP/DGIA will commit to rectify any Reportable Conduct which is verified by the investigation and to follow up with appropriate formal disciplinary

action, up to and including termination of employment of the person(s) that engages in Reportable Conduct.

The Whistleblower will be provided feedback by the Contact Officer (e.g. if no action is taken, the Whistleblower will be informed of the reasons for this) provided there are appropriate arrangements in place to respect the confidentiality of any information.

## ***11. Non-compliance with Policy***

This policy aims to ensure that Whistleblowers are given full support and protection within the organisation. If a person does not comply with this Policy, there are sanctions and disciplinary procedures which may apply, including:

- Failure to comply with this Policy, DGSP/DGIA's compliance obligations or DGSP/DGIA's Compliance Program more broadly, may be grounds for disciplinary action (such as termination of employment).
- Any staff member who is knowingly or recklessly concerned in a contravention of the ASIC Act 2001(ASIC Act) will not be indemnified by DGSP/DGIA.

For example, if a person receives information from the Whistleblower and releases that information to a person not involved in the investigation and without authority of the Whistleblower, this will be considered a serious disciplinary matter.

If reprisals are taken or are claimed to have been taken against a Whistleblower, the Whistleblower will have an automatic right of referral to an independent mediator, if the matter cannot be resolved within DGSP/DGIA.

## ***12. Steps to take if you are dissatisfied with the outcome of the investigation***

### ***12.1 Raising issues with the most senior executives***

If the Whistleblower maintains their concern following the investigation, the Whistleblower may raise it with D&G Group Whistleblowing team [whistleblower@domesticandgeneral.com](mailto:whistleblower@domesticandgeneral.com). This team is based in the UK and consists of the Chief Risk Officer (CRO), the Head of Employee Relations and the Group General Counsel.

### ***12.2 Raising issues with an external body***

If, after the above steps have been completed, the Whistleblower reasonably believes that the right action has not been taken, the Whistleblower can raise the matter outside DGSP/DGIA with a relevant public authority. The relevant public bodies include:

- Australian Security and Investment Commission (**ASIC**);
- Australian Competition and Consumer Commission (**ACCC**);
- Australian Prudential Regulation Authority (**APRA**)

The Policy and the mechanisms have been implemented for a Staff Member to confidently raise a genuine concern about Reportable Conduct.

You should not report or otherwise disclose to external parties (e.g. you should not go directly to the press or express concerns using social media).

### ***13. How the Policy is made available, trained and reviewed***

The policy is available on the D&G Website so that external parties who are eligible to report can have access to the policy. Internal parties have access to the policy through DGSP/DGIA's intranet site, Dingo Space. It will also be provided during the induction process.

All employees will receive training on an annual basis. Senior Managers will receive annual training on how to respond to a Protected Disclosure.

The policy is reviewed on an annual basis and all changes are listed in the 'Document Change Control' table at the start of the policy document.

~End of Policy~