



WHISTLEBLOWER POLICY

# Contents

Purpose and Scope	<u>03</u>
Key Principles of this Policy	<u>03</u>
Applicability of this Policy across the Qantas Group	<u>04</u>
Requirements for a Qualifying Disclosure	<u>05</u>
How to make a disclosure under this Policy	<u>07</u>
How is a Qualifying Disclosure handled under this Policy?	<u>09</u>
How is a Disclosing Person protected under this Policy?	<u>10</u>
Reporting, Reviews and Escalation of Qualifying Disclosures	<u>12</u>
Roles and Responsibilities	<u>13</u>
Compliance and Administration	<u>14</u>

## 1 Purpose and Scope

- 1.1 The purpose of this Policy is to:
- (a) support the Qantas Group Code of Conduct and Ethics;
  - (b) ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported by the Qantas Group;
  - (c) ensure that Whistleblower disclosures are dealt with appropriately and on a timely basis;
  - (d) provide transparency regarding the Qantas Group's processes for receiving, handling and investigating Whistleblower disclosures; and
  - (e) aid in the deterrence of corrupt, illegal or other undesirable conduct.
- 1.2 The *Corporations Act 2001* [Cth] and the *Taxation Administration Act 1953* [Cth] provide protections for persons who make a "Qualifying Disclosure" (see section 4) ["Whistleblower Protection Scheme"].
- 1.3 This Whistleblower Policy:
- (a) explains when a disclosure may qualify for protection under the Whistleblower Protection Scheme;
  - (b) provides information about how Qualifying Disclosures may be safely and securely made;
  - (c) explains how they will be received and handled;
  - (d) sets out the processes involved in investigating Qualifying Disclosures appropriately and in a timely manner; and
  - (e) details the protections that apply to Qualifying Disclosures.
- 1.4 This Whistleblower Policy is divided into the following sections:
- 2. Key Principles of this Policy.
  - 3. Applicability of this Policy across the Qantas Group.
  - 4. Requirements for a Qualifying Disclosure.
  - 5. How to make a disclosure under this Policy.
  - 6. How is a Qualifying Disclosure handled under this Policy.
  - 7. How is a Disclosing Person protected under this Policy.
  - 8. Reporting, Reviews and Escalation of Qualifying Disclosures.
  - 9. Roles and Responsibilities of those involved in the Whistleblower Protection Scheme.
  - 10. Compliance and Administration.

## 2 Key Principles of this Policy

- 2.1 The Qantas Group values and promotes a *speaking up* culture, where all "Disclosing Persons" (see section 4.4) feel comfortable to raise matters that are of legitimate concern to them, including in relation to a potential breach of any legal or regulatory requirement or policy applicable to the Qantas Group.
- 2.2 This Whistleblower Policy is an important tool in deterring corrupt, illegal or other undesirable conduct and uncovering such conduct that may not otherwise be reported or uncovered.
- 2.3 This Whistleblower Policy supports the [Qantas Group Code of Conduct and Ethics](#) and is a part of the Qantas Group's corporate governance framework, aligning with the ASX Corporate Governance Principles and Recommendations, and assisting the Group to meet its legal and regulatory obligations.

### 3 Applicability of this Policy across the Qantas Group

- 3.1 This Whistleblower Policy is applicable to the Qantas Group in all locations worldwide.
- 3.2 As the Qantas Group operates in multiple countries, this Policy is subject to the laws that apply in those countries, which means that in some cases, disclosures made under this Policy may be handled differently according to legislation or regulation in that jurisdiction.
- 3.3 However, regardless of the applicable law, the Qantas Group will at least apply the protections relating to confidentiality and “**Detriment**” (see section 7.12) to all Disclosing Persons who make a Qualifying Disclosure in accordance with this Policy.
- 3.4 In this policy:
  - (a) “**Qantas Group**” or “**Group**” means Qantas Airways Limited ABN 16 009 661 901, its subsidiaries (whether legally or beneficially owned) and related bodies corporate (individually or collectively as the context requires), excluding Qantas Superannuation Limited (ABN 47 003 806 960), which has a separate, stand-alone Whistleblower Policy, available on its website.
  - (b) “**Qantas**” means Qantas Airways Limited ABN 16 009 661 901.

## 4 Requirements for a Qualifying Disclosure

### What is a Qualifying Disclosure?

- 4.1 **Disclosing Persons** must make their disclosure to an **“Eligible Recipient”** (see sections 4.5–4.6) or to certain regulators (see section 5.7) in order to qualify for protection under the Whistleblower Protection Scheme.
- 4.2 A **“Qualifying Disclosure”** under the Whistleblower Protection Scheme is when a Disclosing Person makes a disclosure to an Eligible Recipient, and the Disclosing Person has **reasonable grounds to suspect** that the disclosure concerns a **“Disclosable Matter”** (see section 4.7).
- 4.3 Disclosures that are not Qualifying Disclosures do not qualify for protection. Non-qualifying disclosures may be protected under other legislation, such as in Australia the *Fair Work Act 2009* [Cth].

### Who is a Disclosing Person?

- 4.4 A **“Disclosing Person”** is any current or former:
- (a) officer (including a director) or employee of any Qantas Group entity;
  - (b) individual who supplies goods or services to any Qantas Group entity whether paid or unpaid (which may include, among others, contractors, consultants, business partners and service providers);
  - (c) employee of a person that supplies goods or services to any Qantas Group entity whether paid or unpaid;
  - (d) individual who is an associate (as defined by the *Corporations Act 2001* [Cth]) of any Qantas Group entity; and
  - (e) any individual who is a relative, spouse or dependant (or the dependant of a spouse) of any of the above persons.

### Who is an Eligible Recipient?

- 4.5 An **“Eligible Recipient”** of a Qualifying Disclosure under the Whistleblower Protection Scheme and in relation to this Whistleblower Policy is any one of the following:
- (a) an officer or senior manager of a Qantas Group entity (a senior manager is generally regarded as a member of the [Group Management Committee](#));
  - (b) an auditor (internal or external) or actuary of a Qantas Group entity; or
  - (c) a person authorised by the Qantas Group to receive Qualifying Disclosures (see section 5.1).

For the purposes of this Policy, an ‘auditor’ is an external person or entity acting in that capacity to review or audit financial reports of a Qantas Group Entity as required by the *Corporations Act 2001* [Cth] or a Qantas Group employee within the Group Audit and Risk department acting in the capacity of an internal auditor.

- 4.6 For matters which relate only to tax affairs of the Qantas Group, an **“Eligible Recipient”** is, in addition to the above:
- (a) any registered tax agent or BAS agent who provides tax agent or BAS services to any Qantas Group entity; or
  - (b) a Qantas Group employee who has functions or duties that relate to the tax affairs of any Qantas Group entity (generally regarded as being a Qantas Group employee within the Group Taxation department).

### What is a Disclosable Matter?

- 4.7 A **“Disclosable Matter”** under the Whistleblower Protection Scheme is information that:
- (a) concerns misconduct or an improper state of affairs or circumstances in relation to any entity within the Qantas Group; or
  - (b) indicates that any entity in the Qantas Group or one of its officers or employees has engaged in conduct that:
    - i. constitutes an offence against the *Corporations Act 2001* [Cth], *Australian Securities and Investments Commission Act 2001* [Cth], *Banking Act 1959*, *Financial Sector (Collection of Data) Act 2001*, *Insurance Act 1973*, *Life Insurance Act 1995*, *National Consumer Credit Protection Act 2009*, *Superannuation Industry (Supervision) Act 1993*, and any instrument made under these Acts;
    - ii. constitutes an offence against Commonwealth legislation that is punishable by imprisonment for 12 months or more;
    - iii. represents a danger to the public or the financial system; or
    - iv. is prescribed by regulation.

Disclosable Matters can also be in relation to the tax affairs of an entity in the Qantas Group if the discloser considers that this information may assist the Qantas Group to perform functions or duties in relation to its tax affairs.

Examples of conduct that may be a Disclosable Matter include conduct that breaches any legal or regulatory requirement or conduct that while not involving a contravention of a particular law, is a breach of the [Qantas Code of Conduct and Ethics](#) or any other Qantas Group Policy. Examples of Disclosable Matters include:

- (a) fraud;
- (b) negligence;
- (c) breach of duty or trust;
- (d) default;
- (e) criminal offences;
- (f) failure to comply with any legal obligation;
- (g) failure to comply with any other obligation of Qantas as a company listed on the ASX;
- (h) unfair or unethical dealing with a customer, supplier or agent of the Qantas Group;
- (i) corrupt conduct;
- (j) human rights abuses;
- (k) risk to the health or safety of any person;
- (l) unethical conduct; or
- (m) any deliberate concealment relating to the above.

4.8 Disclosing Persons can still qualify for the protections under the Whistleblower Protection Scheme even if their disclosure turns out to be incorrect or unsubstantiated, as long as they had reasonable grounds to suspect that a Disclosable Matter existed at the time of the disclosure.

4.9 Generally, disclosures that relate solely to personal work-related grievances do not qualify for protection under the Whistleblower Protection Scheme. A disclosure will concern a personal work-related grievance of the Disclosing Person if the information:

- (a) concerns a grievance about any matter in relation to the discloser's employment, or former employment, having or tending to have implications for the discloser personally;
- (b) does not have significant implications for the Qantas Group unrelated to the Disclosing Person; or
- (c) does not concern conduct or alleged conduct described in section 4.7 above.

4.10 Examples of disclosures regarding personal work-related grievances that may not qualify for protection include:

- (a) an interpersonal conflict between a Disclosing Person and another employee;
- (b) a decision that does not involve a breach of workplace laws;
- (c) a decision relating to the employment, transfer or promotion of the Disclosing Person;
- (d) a decision relating to the terms and conditions of employment of the Disclosing Person; or
- (e) a decision to suspend or terminate the employment of the Disclosing Person, or otherwise discipline the Disclosing Person.

4.11 A disclosure of a personal work-related grievance may still qualify for protection if it:

- (a) concerns a Disclosable Matter that is accompanied by a personal work-related grievance;
- (b) concerns a potential breach of Commonwealth laws punishable by a period of imprisonment of 12 months or more;
- (c) concerns any Qantas Group entity engaging in conduct that represents a danger to the public;
- (d) concerns any Qantas Group entity engaging in misconduct that extends beyond the Disclosing Person's personal circumstances;
- (e) concerns allegations that the Disclosing Person or another person has suffered, or has been threatened with, detriment as a result of the Disclosing Person making a Qualifying Disclosure; or
- (f) involves a Disclosing Person seeking legal advice about the operation of the Whistleblower Protection Scheme.

Personal work-related grievances are to be raised in accordance with the Qantas Group's Employee Grievance Resolution Guidelines. Disclosures that relate solely to personal-work related grievances that do not qualify for protection under the Whistleblower Protection Scheme will generally be dealt with under the Qantas Group's Employee Grievance Resolution Guidelines.

## 5 How to make a disclosure under this Policy

### How do I make a disclosure?

- 5.1 While disclosures can be made to any Eligible Recipient, the Qantas Group encourages Disclosing Persons who have reasonable grounds to suspect a Disclosable Matter to make a disclosure to the following Eligible Recipients by:
- (a) contacting the Whistleblower hotline, which is independently managed on behalf of Qantas by PricewaterhouseCoopers (via phone on 1800 855 212 or +612 8266 1453, via email at [qantaswhistleblower@au.pwc.com](mailto:qantaswhistleblower@au.pwc.com), or post at PO Box Q654, QVB Post, NSW 1230, Australia);
  - (b) submitting a report to the online Whistleblower portal at <https://qantas.whispli.com/qantas-whistleblower>, by scanning the QR code available in Attachment 1 of this Policy; or
  - (c) contacting directly to any member of the Whistleblower Committee:
    - i. General Counsel and Group Executive, Office of the CEO (Chair);
    - ii. Group Executive Strategy, People and Technology;
    - iii. Chief Executive Officer, Qantas Loyalty;
    - iv. Executive Manager Group Audit and Risk; or
    - v. Group Chief Security Officer.
- 5.2 If a Disclosing Person does not feel comfortable making a disclosure using the channels outlined in section 5.1, they can also make a disclosure to any other Eligible Recipient within the Qantas Group, as outlined in sections 4.5 and 4.6 of this Policy.
- 5.3 Subject to the confidentiality protections set out in section 7.1 below, disclosures made to an Eligible Recipient, including to the Whistleblower hotline or via the Whistleblower portal, are generally provided to the **“Whistleblower Committee Secretariat”** (see section 6.1) for distribution to the **“Whistleblower Committee”** (see section 5.1(c)).
- 5.4 If a Qualifying Disclosure relates to, or may give rise to a conflict with:
- (a) a member of the Whistleblower Committee, that disclosure should be made to the Group Chief Executive Officer;
  - (b) the Group Chief Executive Officer or a Director of Qantas Airways Limited, that disclosure should be made to the Chair of the Board; or
  - (c) the Chair of the Board, that disclosure should be made to the Chair of the Audit Committee, **“Senior Investigative Person”**.
- 5.5 In the circumstances outlined in section 5.4, the appropriate Senior Investigative Person is responsible for assessing whether a disclosure is a Qualifying Disclosure and how it will be investigated, including through the use of an external investigator.
- 5.6 It is preferred that Disclosing Persons identify themselves when making a disclosure, as this greatly assists the investigation process. However, Disclosing Persons may choose to make their disclosure anonymously and remain anonymous over the course of the investigation and after the investigation is finalised. They may also decide not to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. In these circumstances, for Qualifying Disclosures, the protections under the Whistleblower Protection Scheme still apply. If a disclosure is made anonymously, the Disclosing Person should provide sufficient information to allow the matter to be properly investigated and the Qantas Group encourages Disclosing Persons to provide an anonymous email address, and adopt a pseudonym for the purpose of the disclosure, through which additional questions can be asked and information provided and to assist in protecting anonymity.
- 5.7 While the Qantas Group encourages Disclosing Persons to make disclosures internally, a Disclosing Person may choose to make a disclosure about a Disclosable Matter directly to a regulator in the relevant jurisdiction. In Australia, the Australian Securities and Investments Commission (**“ASIC”**), the Australian Prudential Regulatory Authority (**“APRA”**), the Commissioner of Taxation through the Australian Tax Office (**“ATO”**) (in relation to tax affairs only) or another Commonwealth body prescribed by regulations are able to receive disclosures that qualify for protection under the Whistleblower Protection Scheme.
- 5.8 The respective websites of ASIC, APRA and the ATO provide further detail about when and how a Disclosing Person may make a disclosure to each body.
- 5.9 In Australia, disclosures of information to a qualified legal practitioner for the purpose of taking legal advice or legal representation in relation to the operation of the Whistleblower Protection Scheme also qualify for protection (even in the event that the legal practitioner concludes that a disclosure does not relate to a Disclosable Matter).
- 5.10 In Australia, where a Disclosing Person has previously made a Qualifying Disclosure to ASIC, APRA, or another Commonwealth body prescribed by regulation, that person may be eligible to make a disclosure that qualifies for protection under the Whistleblower Protection Scheme, to a journalist or to a **“Member of Parliament”** (being a Member of an Australian Commonwealth or State Parliament or an Australian Territory Legislature) — being a **“Public Interest Disclosure”** or **“Emergency Disclosure”** — if they meet the criteria set out at sections 5.11–5.12.

- 5.11 A Public Interest Disclosure is a disclosure made to a journalist or Member of Parliament where:
- (a) at least 90 days have passed since the previous making of a Qualifying Disclosure to ASIC, APRA or another prescribed Commonwealth body;
  - (b) the Disclosing Person does not have reasonable grounds to believe that action has been, or is being taken in relation to their Qualifying Disclosure;
  - (c) the Disclosing Person has reasonable grounds to believe that making a further Qualifying Disclosure is in the public interest;
  - (d) the Disclosing Person has given prior written notice to ASIC, APRA or the Commonwealth body to which they made their previous Qualifying Disclosure, outlining that they intend to make a Public Interest Disclosure and providing sufficient information so as to identify their previous Qualifying Disclosure; and
  - (e) the extent of the information disclosed in the public interest disclosure is no greater than to inform the journalist or Member of Parliament of the misconduct or improper state of affairs or circumstances, or other conduct falling within the scope of the Whistleblower Protection Scheme.
- 5.12 An Emergency Disclosure is a disclosure made to a journalist or Member of Parliament where:
- (a) a Qualifying Disclosure has previously been made to ASIC, APRA, or another prescribed Commonwealth body;
  - (b) the Disclosing Person 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;
  - (c) the Disclosing Person has given prior written notice to the Commonwealth body to which they made their previous Qualifying Disclosure, outlining that they intend to make an Emergency Disclosure and providing sufficient information so as to identify the previous Qualifying Disclosure; and
  - (d) only includes information to the extent necessary to inform the journalist or Member of Parliament of the substantial and imminent danger is disclosed.
- 5.13 Disclosing Persons should seek the advice of an independent legal adviser before making a disclosure to a regulator in a jurisdiction, a Public Interest Disclosure or an Emergency Disclosure as outlined in sections 5.7–5.12. It is important that a Disclosing Person understands the criteria for protection under the relevant legislation.



## 6 How is a Qualifying Disclosure handled under this Policy?

### Whistleblower Committee Secretariat

- 6.1 The Whistleblower Committee is supported by the Whistleblower Committee Secretariat, comprising members of the Group Secretariat department.
- 6.2 The Whistleblower Committee Secretariat are authorised to review disclosures received via the channels outlined in sections 5.1–5.2 and distribute them to the Whistleblower Committee in accordance with section 6.4.

### Receipt and handling of a Qualifying Disclosure

- 6.3 Disclosures received:
  - (a) by PWC through a channel outlined in section 5.1; or
  - (b) by an Eligible Recipient under section 5.2,may be provided to the Whistleblower Committee Secretariat securely for triage assessment. The Disclosing Person's identity must not be provided to the Whistleblower Committee Secretariat unless that Disclosing Person has provided consent for their identity to be provided confidentially to Qantas or the Whistleblower Committee for the purposes of conducting a review or investigation.
- 6.4 Disclosures received by the Whistleblower Committee Secretariat will be triage assessed to determine whether a disclosure has the necessary characteristics of a Qualifying Disclosure and to determine whether a formal, in-depth investigation is required.
- 6.5 Once assessed, disclosures with the necessary characteristics of Qualifying Disclosures are provided to the Whistleblower Committee for acceptance. The Whistleblower Committee Secretariat may also recommend, and the Whistleblower Committee may accept, the appointment of an appropriate "Investigation Officer" to review the circumstances raised in a Qualifying Disclosure.
- 6.6 Triage Assessments by the Whistleblower Committee Secretariat will usually be conducted within a maximum of five business days, if not sooner; and, where contactable, Disclosing Persons will be informed whether their disclosure has been accepted as a Qualifying Disclosure.
- 6.7 In certain circumstances, disclosures received by Whistleblower Committee Members or Senior Investigative Persons may be triage assessed and managed directly by a Whistleblower Committee Member or Senior Investigative Person, as appropriate, which may include the appointment of an appropriate Investigation Officer.

### Investigations

- 6.8 An investigation will generally involve the appointed Investigation Officer making inquiries and collecting evidence for the purpose of assessing whether the Qualifying Disclosure can be substantiated. While investigations may generally take up to three months to complete, they may be longer and vary on a case by case basis, dependent on several factors, including but not limited to the quality of information provided in a disclosure, and the availability of information and witnesses.
- 6.9 Employees about whom disclosures are made will generally be given an opportunity to respond to the relevant allegations made in the Qualifying Disclosure.
- 6.10 Where the Investigation Officer is aware of the Disclosing Person's identity, they must take reasonable steps to minimise the chance that they expose the Disclosing Person's identity or information that may lead the exposure of the Disclosing Person's identity without the Disclosing Person's consent to expose their identity. Investigations may be limited where the Disclosing Person withholds this consent or where information available to the Investigation Officer is otherwise limited.
- 6.11 Where a Qualifying Disclosure concerns multiple Disclosable Matters or includes a Personal Work-Related Grievance, the Whistleblower Committee Secretariat may recommend, and the Whistleblower Committee may accept, the appointment of more than one Investigation Officer.
- 6.12 In the circumstances contemplated in section 6.11, the Whistleblower Committee has the discretion to instruct the Investigation Officer(s) to investigate the Disclosable Matters and/or Personal Work-Related Grievance concurrently, consecutively, or independently of each other, as appropriate.
- 6.13 Personal Work-Related Grievances related to Qualifying Disclosures may be investigated following either the Qantas Group's Employee Grievance Resolution Guidelines or the investigative process deemed most appropriate by the Investigation Officer. Nothing in this section detracts from the protections available to an eligible Disclosing Person under the Whistleblower Protection Scheme.

## 7 How is a Disclosing Person protected under this Policy?

### Confidentiality

- 7.1 Under the Whistleblower Protection Scheme, Disclosing Persons making a Qualifying Disclosure are protected at law by the requirement that their identity, and information that may lead to their identification, must be kept confidential, subject to relevant exceptions outlined below.
- 7.2 **Exception for consent:** A Disclosing Person's identity can always be disclosed with their consent. If a Disclosing Person qualifies for protection, it is likely that the Disclosing Person will be asked to provide consent to the disclosure of their identity or information that is likely to lead to their identification. This would be to facilitate any investigation and/or resolution of the matter. If consent is withheld, it may not be possible to adequately investigate and respond (if at all) to the disclosure.
- 7.3 **Exception for disclosure to authorities:** It will still be lawful to disclose a Disclosing Person's identity to ASIC, APRA, the Australian Federal Police or the ATO (such bodies can disclose the identity of a Disclosing Person to specified authorities to help them in the performance of their functions or duties). Disclosures to a legal practitioner for the purpose of obtaining advice or representation about the application of the Whistleblower Protection Scheme, are also lawful.
- 7.4 **Exception to disclose certain information:** It will also be lawful to disclose information that may lead to the identification of the Disclosing Person in a disclosure without the Disclosing Person's consent if this is reasonably necessary for the purpose of investigating the matter (provided the information does not include the Disclosing Person's identity and the Qantas Group takes all reasonable steps to reduce the risk that the discloser will be identified as a result of the information being disclosed).
- 7.5 Under the Whistleblower Protection Scheme, breaching the principal confidentiality protection regarding the discloser's identity and/or information likely to lead to the identification of the discloser is a criminal offence and those involved may be the subject of criminal, civil and disciplinary proceedings.
- 7.6 The Whistleblower Committee will ensure that all Committee files and documents are kept secure.
- 7.7 In order to minimise the risk of a breach of confidentiality, where appropriate, action may be taken, including the partial redaction of reports, the use of appropriate language in communications, and the use of pseudonyms or non-identifying descriptors when referring to the Disclosing Person. At the time of making a Qualifying Disclosure, Disclosing Persons should alert Eligible Recipients to information in their disclosure that will or is likely to lead to their identification as the Disclosing Person.
- 7.8 In practice, and despite the best efforts of the Disclosing Person and the Whistleblower Committee, it is important to recognise that a Disclosing Person's identity may still be ascertained if the Disclosing Person has previously mentioned to other people that they are considering making a disclosure, the Disclosing Person is one of a very small number of people with access to the information or the disclosure related to information that a Disclosing Person has previously been told privately and in confidence.

### Protection from Detrimental Acts or Omissions

- 7.9 Disclosing Persons are protected under the Whistleblower Protection Scheme from victimisation and suffering any "Detriment" (see section 7.11) by reason of the Qualifying Disclosure. It is unlawful for a person to engage in conduct against another person that causes, or will cause, Detriment in circumstances where the person believes or suspects that the other person or any other person made, may have made, proposes to make or could make a Qualifying Disclosure.
- 7.10 Threats of Detriment are also unlawful. Such a threat could be express or implied, conditional or unconditional.
- 7.11 Detriment includes without limitation:
- (a) dismissal of an employee;
  - (b) injury of an employee in his or her employment;
  - (c) alteration of an employee's position or duties to his or her disadvantage;
  - (d) discrimination between an employee and other employees;
  - (e) harassment or intimidation of a person;
  - (f) harm or injury to a person, including psychological harm;
  - (g) damage to a person's property, reputation, business or financial position; or
  - (h) any other damage to a person.
- 7.12 Conduct that does not cause Detriment includes:
- (a) administrative action that is reasonable for the purpose of protecting a Disclosing Person from Detriment; and/or
  - (b) managing a Disclosing Person's unsatisfactory work performance, in circumstances where such action is in line with the relevant Qantas Group entity's performance management framework.

- 7.13 Employees of the Qantas Group found to have engaged in conduct that may cause Detriment will be subject to disciplinary action. Any person that engages in conduct that may cause Detriment may also be subject to civil and criminal liability (including imprisonment) in respect of that conduct and the Detriment caused.
- 7.14 Any person who suffers any loss, damage or injury because of Detriment associated with a disclosure can seek compensation through the courts if the Qantas Group failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct under the Whistleblower Protection Scheme.
- 7.15 If any person becomes aware of conduct that may cause Detriment occurring, they should report this to the Whistleblower Committee.
- 7.16 Under the Whistleblower Protection Scheme, Courts have broad scope to make orders remedying a Detriment or threatened Detriment. These include injunctions, compensation orders (including against individual employees and their employer), reinstatement, exemplary damages and the making of apologies. For example, civil and criminal sanctions apply to breaches of the Whistleblower Protection Scheme in Australia.

#### **Immunities**

- 7.17 In Australia, a Disclosing Person who makes a disclosure that qualifies for protection under the Whistleblower Protection Scheme will not be subject to criminal, civil and/or administrative liability (including disciplinary action) by the Qantas Group and no contractual or other remedy or right may be enforced or exercised against the Disclosing Person on the basis of the Qualifying Disclosure. However, that does not prevent the person being subject to civil, criminal or administrative liability because of the conduct of the person revealed by the Qualifying Disclosure.

#### **Disclosing Person Protection Officer and protecting Disclosing Persons from Detriment**

- 7.18 Where appropriate, the Whistleblower Committee may appoint a Disclosing Person Protection Officer (“DPPO”) to safeguard the interests of the Disclosing Person. The DPPO will, where practicable, take whatever action is possible to ensure that the Disclosing Person is protected from Detriment for making a Qualifying Disclosure.
- 7.19 Where appropriate, the DPPO, the Whistleblower Committee Secretariat and/or the Investigation Officer may work together to develop or implement strategies to minimise the chance of Detriment being caused to the Disclosing Person. This may include the use of management processes, risk assessments and/or interventions such as, in appropriate circumstances, change of reporting line or workplace location.

## 8 Reporting, Reviews and Escalation of Qualifying Disclosures

### Reporting

- 8.1 Investigation Officers will generally be required to provide progress reports to the Whistleblower Committee and Whistleblower Committee Secretariat from time to time, as well as a final investigation report.
- 8.2 Where practicable and appropriate, the Whistleblower Committee and/or Whistleblower Committee Secretariat, will periodically contact Disclosing Persons to provide them with a status update about when the investigation has begun, while the investigation is in progress and at the end of an investigation to inform them that the investigation has been completed and of the final outcome of the investigation. The frequency and the timeframe of any updates may vary depending on the nature of the disclosure and investigation. Owing to privacy considerations and limitations, Qantas may also be restricted in the level of information that can be provided to a Disclosing Person when providing updates. There may be circumstances where it may not be appropriate to provide details of the outcome of an investigation to the Disclosing Person.
- 8.3 Reporting relating to Qualifying Disclosures will be provided to the Whistleblower Committee and the Board Audit Committee, as appropriate. While the method for documenting and reporting the findings of an investigation will depend on the nature of the disclosure, it may include a summary report of the findings. Any reporting of findings will have regard to applicable confidentiality requirements.

### Complaints

- 8.4 Qantas takes its responsibilities under the Whistleblower Protection Scheme seriously. Where a Disclosing Person believes that:
- (a) an Eligible Recipient or other person involved in the receipt, handling or investigation of their Qualifying Disclosure has breached the requirements relating to the confidentiality of the Disclosing Person's identity; or
  - (b) another person has engaged in conduct that has caused, is causing or will cause Detriment to either the Disclosing Person or a third person, in circumstances where the person believes or suspects that the Disclosing Person, or any other person made, may have made, proposed to make or could make a Qualifying Disclosure,
- they may seek a review of the circumstances to determine whether a breach has occurred, through the Whistleblower portal or by writing to or calling the Whistleblower hotline. A Disclosing Person may also raise such concerns directly with a member of the Whistleblower Committee or, where appropriate, a Senior Investigative Person.

### Fair Treatment of Persons Mentioned in a Qualifying Disclosure

- 8.5 Qantas will take all reasonable steps to ensure that any Qantas Group employee or other person who is the subject of or mentioned in a Qualifying Disclosure will be, as appropriate:
- (a) informed about the matter in accordance with the principles of natural justice and procedural fairness;
  - (b) given a reasonable opportunity to put their case to the Investigation Officer if any investigation is conducted; and
  - (c) informed of the outcome of the investigation (but will not be given a copy of the investigation report).

Where an investigation is unable to substantiate a Qualifying Disclosure, the fact that an investigation has been carried out, the results of the investigation, and the identity of any person(s) who is the subject of the Qualifying Disclosure, will to the extent and as contemplated by this Policy remain confidential.

## 9 Roles and Responsibilities of those involved in the Whistleblower Protection Scheme

### Qantas Group Employees and Disclosing Persons

9.1 If a Disclosing Person becomes aware of possible illegal, unethical or otherwise improper conduct that they think is not being properly handled within the Qantas Group, it is critical that they take steps to advise the Qantas Group through this Whistleblower Policy.

### Whistleblower Committee Obligations

9.2 In addition to the obligations outlined elsewhere in the Whistleblower Policy, the Whistleblower Committee must:

- (a) meet at least twice each year, and otherwise as required to ensure the appropriate handling of all Qualifying Disclosures;
- (b) undertake training on a regular basis, to ensure that the Committee members' knowledge in relation to Whistleblower-related laws and regulations remains current; and
- (c) report to the Qantas Group CEO and Board Audit Committee on at least an annual basis, and otherwise as necessary.

### Whistleblower Committee Secretariat Obligations

9.3 In addition to the obligations outlined elsewhere in this Policy, the Whistleblower Committee Secretariat must:

- (a) keep up to date and secure records of Qualifying Disclosures received and investigated by the Whistleblower Committee;
- (b) prepare papers for Whistleblower Committee and Board Audit Committee meetings, as required;
- (c) facilitate training for and communications to employees to increase awareness of this Whistleblower Policy;
- (d) facilitate training for Eligible Recipients, Investigation Officers and DPPOs in relation to their obligations under this Whistleblower Policy; and
- (e) complete any task in relation to the requirements of this Whistleblower Policy, as reasonably delegated or required by the Whistleblower Committee.

### DPPO

9.4 A DPPO is responsible for taking, where practicable, whatever reasonable action is required to ensure that the Disclosing Person is protected from Detriment.

### Investigation Officer

9.5 An Investigation Officer has responsibility for conducting an investigation into a Qualifying Disclosure received from a Disclosing Person. The Investigation Officer will not be the same person as the DPPO.

### Interpretation of this Policy

9.6 Any questions in relation to the interpretation of the Whistleblower Policy documents, or for further information before formally making a disclosure, should be forwarded to the General Counsel and Group Executive, Office of the CEO, or as outlined in section 10.7.

## 10 Compliance and Administration

### Breaches

- 10.1 A breach of the protections provided under the Whistleblower Protection Scheme will be treated as a serious disciplinary matter.
- 10.2 The Qantas Group will treat all reports of Disclosable Matters seriously and endeavour to protect anyone who raises concerns in line with this Policy. However, false reports can have significant effects on the reputations of Qantas Group employees and would also cause considerable waste of time and effort. A deliberately false disclosure under this Policy will be treated as a serious disciplinary matter, a consequence for which may include dismissal.

### Review and Updates

- 10.3 The Policy owner will review and update this Policy document as required and at a minimum every two years to maintain relevance.

### Related Policy Documents

- 10.4 The following are considered relevant related Policy documents which are to be read in conjunction with this Policy:
- (a) [Qantas Code of Conduct and Ethics](#)
  - (b) Qantas Standards of Conduct Policy
  - (c) Qantas Group Employee Grievance Resolution Guidelines

### Availability

- 10.5 This policy is publicly available on the [Qantas Group website](#) and internally on the relevant staff intranet sites.
- 10.6 For external suppliers, contactors, business partners and officers, this Policy is made available as part of initial introduction to the Qantas Group, either through access to the Qantas Group website, the Supplier Code of Conduct, or as part of director and officer induction.

### Further information

- 10.7 A discloser may, at any time, seek further information relating to the making, receipt, handling and investigation of Qualifying Disclosures or about the protections available to Disclosing Persons by using the channels outlined in section 5.1 to contact the Whistleblower Committee Secretariat, or by sending an email to [wocomms@qantas.com.au](mailto:wocomms@qantas.com.au). It is also recommended that, where appropriate, Disclosing Persons consider obtaining independent legal advice.

### Support

- 10.8 The Qantas Group offers employees confidential and independent counselling through the Employee Assistance Program managed by Converge International. Employees may call 1300 687 327 or +613 8620 5300 from outside of Australia.

### Policy

- 10.9 This Policy is not a term of any contract, including any contract of employment, and does not impose any contractual duties, implied or otherwise, on the Qantas Group. This Policy may be varied by the Qantas Group from time to time.

**Attachment 1**

**QANTAS ONLINE WHISTLEBLOWER PORTAL QR CODE**

Qantas Group Employees can access the online Whistleblower portal by scanning the below QR Code with any enabled device.

