

## Our Ethics and Whistleblower Reporting

Australia Post Group (**the Group**) has established a whistleblower hotline to enable workplace participants to make a disclosure of serious unethical, unlawful or wrongful conduct in accordance with the *Public Interest Disclosure Act 2013 (PID Act)* or the *National Anti-Corruption Commission Act 2002 (Cth) (NACC Act)* or the *Corporations Act 2001 (Cth) (Corporations Act)* or the *Taxation Administration Act 1953 (Cth) (Taxation Administration Act)*.

You can make a whistleblower disclosure if you are a current or former:

- Employee, officer or associate of the Group;
- Contractor or supplier of goods or services to the Group and their employees or subcontractors, or a volunteer or work experience student (whether paid or unpaid);
- Licensee of a Licensed Post Office of the Group;
- Employee of a Licensed Post Office of the Group;
- Officer or associate of the Group; or
- A spouse, relative or family member of any of the above;

and

- Your concern does not relate to a Customer Complaint;
- Your concern does not relate to a personal work-related grievance;
- You have reasonable grounds to suspect serious wrongdoing within or by the Group or by someone at or connected with the Group.

## Customer Complaints

Customers who wish to provide make a complaint or have concerns about the Group's services should contact the Customer Contact Centre via post, email, phone on 13 76 78 or online via <https://auspost.com.au/about-us/corporate-information/complaints-and-feedback#letter>

The type of activity that does not meet the whistleblower criteria includes complaints regarding:

- a) the delivery of mail or parcels;
- b) the collection of mail or service received at an Australia Post facility; or
- c) the behaviour of Australia Post team members ie. reporting driving offences.

## Personal work-related grievances

A personal work-related grievance is an act or omission taken in relation to the engagement or appointment and/or employment (i.e. a work-related action) that has, or would tend to have, personal implications for the individual (i.e. the action personally affects that person).

Personal work-related grievances may be:

- An interpersonal conflict between employees (e.g. bullying, harassment, discrimination or general workplace conflict)
- A decision relating to the employment, engagement, transfer, or promotion within the company;
- A decision to suspend or terminate or discipline a person or the terms and conditions of the engagement or employment.

The most appropriate avenues for employees of Australia Post Group to report personal work-related grievances are:

- For harassment including sexual harassment and sex-based harassment, discrimination or bullying concerns that relate to individuals personally, contact the HDB Hotline on 1300 116 947 or by logging a case via the People Services Portal;
- For other personal work-related matters, contact People Services by logging a case via the People Services Portal.

Whilst a personal work-related grievance is generally not considered a Whistleblower matter, if the conduct relates to reprisal action (for example if a person is encountering a personal work-related grievance as a result of previously reporting misconduct), or the conduct is so significant it would undermine public confidence, a person could be protected under the relevant whistleblower laws.

### **What is a protected Whistleblower Disclosure?**

A whistleblower disclosure may be made if you suspect serious unethical, unlawful or wrongful conduct and this includes:

- a) Conduct or practices that may breach an Australian or foreign law, regulation or code;
- b) Corrupt or fraudulent conduct (such as misappropriation of funds, bribery, undue influence, false or misleading information etc.);
- c) Maladministration or a substantial mismanagement or wastage of Australia Post's resources (such as unauthorised use of fuel cards for private vehicles, using APG resources/information for personal gain etc.);
- d) Conduct involving substantial risk to health or safety or significant danger to the environment or to the public;
- e) Conduct involving potential breaches of human rights standards;
- f) Conduct that may cause serious financial or non-financial loss to the Group or damage to its reputation and brand, or that may otherwise cause danger to the financial system; or
- g) A serious breach of Our Ethics.

## How to Make a Whistleblower Disclosure

If you wish to report suspected serious wrongdoing, a disclosure can be made via the Australia Post Group Our Ethics and Whistleblower Reporting Service on 1800 799 353 (Australia) or via the [Australia Post Group Our Ethics and Whistleblower Reporting Service](http://www.AustraliaPostOurEthicsandWhistleblowerReporting.deloitte.com.au) portal [www.AustraliaPostOurEthicsandWhistleblowerReporting.deloitte.com.au](http://www.AustraliaPostOurEthicsandWhistleblowerReporting.deloitte.com.au).

Provided that your disclosure is (or is deemed to be) a public interest disclosure or disclosure under the PID Act (and the NACC Act, if the disclosure constitutes a NACC disclosure), the *Corporations Act* or *Taxation Administration Act 1953*, it will be managed in accordance with the relevant whistleblower legislation, as described below, upon receipt by our external provider.

## Information to Include

When providing a disclosure you should consider providing as many of the following details as possible, to assist Australia Post Group in determining the best course of action:

- Your name and contact details (recommended, however anonymous disclosures can be made)
- The nature of the wrongdoing
- Names of people involved (if the person is a contracted service provider, the provider details and location)
- When and where the wrongdoing occurred including date, time and location
- Money or assets involved (if relevant)
- Any relevant events surrounding the wrongdoing
- Anyone else aware of or involved in the wrongdoing
- Anyone else who may verify the claims
- How often the incident has happened
- If you did anything in response to the wrongdoing
- If you are concerned about a possible reprisal
- Any supporting information (e.g. Documents, file notes)
- Any other information that may assist with reviewing and investigating the disclosure

The information provided should be clear and factual. Avoid speculation, personal attacks and emotive language.

## Handling of your disclosure

After you make a Whistleblower disclosure, the Whistleblower team will assess whether the disclosure relates to a public interest disclosure under the PID Act or a disclosure under the Corporations Act or Taxation Administration Act.

You will be informed of any decision to allocate your disclosure to an investigator and given the opportunity to decide whether you wish to have your identity passed on to the investigator. If you do not wish for your identity to be made known to the investigator, this may impact on their ability to investigate your concerns.

If the disclosure does not meet the requirements of a public interest disclosure under the PID Act or a disclosure under the Corporations Act or Taxation Administration Act but can be considered under a different policy, the Whistleblower team will refer the matter to the appropriate team to consider and investigate (where applicable) the issues further.

### **Protections under the PID Act, NACC Act, Corporations Act and Taxation Administration Act**

If your matter is determined to be a public interest disclosure under the PID Act (and the NACC Act, if the disclosure constitutes a NACC disclosure) or a disclosure under the Corporations Act or Taxation Administration Act, the following rights apply to you:

- Your disclosure will be handled confidentially and in a timely manner
- You have immunity from civil, criminal and administrative liability in relation to making a protected disclosure
- You have protection from detriment or reprisal caused to a public official for making a disclosure or who is suspected of having made a disclosure
- You will receive updates about the decision making at certain points during the investigation process

Protections from reprisal and immunity from civil, criminal and administrative liability are also provided to others who provide assistance in relation to the investigation of a PID.

These protections and immunities continue to apply after any investigation is finalised.

However, the whistleblower laws will not protect you if you knowingly disclose false or misleading information, or from the consequences of your own wrongdoing identified as a result of your disclosure.

### **Your responsibilities**

As a person making a disclosure under the PID Act, the Corporations Act or the Taxation Administration Act, you:

- Do not knowingly report false or misleading information
- Are discreet about your disclosure and maintain confidentiality throughout the whistleblower disclosure and investigation process
- Provide reasonable assistance as required during the investigation
- Seek advice about the process and your rights and responsibilities
- Alert your supervisor or the authorised officer to any problems that you may be facing or possible reprisal action in relation to your disclosure – this can be reported via the Australia Post Group Our Ethics and Whistleblower Reporting Service
- Seek appropriate support if you need it

### **Anonymous Disclosers**

When making a disclosure you can elect to either identify yourself or make an anonymous disclosure. Anonymous disclosures may limit the effectiveness of any investigation process and may prevent an investigation from progressing at all.

By identifying yourself, you receive the protection, support and update entitlements provided under the PID Act, Corporations Act or the Taxation Administration Act. It also provides investigators the opportunity to clarify information or gather new information you may have.

Australia Post Group has the discretion not to investigate if contact details are not provided and further information is required.

### **Further information**

The PID Act: <https://www.ombudsman.gov.au/complaints/public-interest-disclosure-whistleblowing/information-for-disclosers>

NACC Act: <https://www.nacc.gov.au/about-nacc/overview>

The Corporations Act: <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/>

The Taxation Administration Act: <https://www.ato.gov.au/general/gen/whistleblowers/>