

# Whistleblower Policy

Incorporating AIA Australia Limited and  
AIA Financial Services Limited

July 2019



# 1. Scope and Definitions

## 1.1. Purpose and Background

Speaking up about any issues or concerns we have is an important way to ensure that AIA continues to embody its Operating Philosophy of doing the Right Thing, in the Right Way, with the Right People. Individuals (known as Whistleblowers) may seek to report incidents anonymously or confidentially by making a Protected Disclosure. This Policy outlines what kinds of disclosures will be Protected Disclosures, what protections are extended to Whistleblowers by AIAA, how an individual can go about making a protected disclosure, and how AIAA will manage matters that are raised by Protected Disclosures.

## 1.2. Scope

This Policy applies to the AIA Australia and AIA Financial Services businesses (together referred to as 'AIAA'), including AIAA employees seconded to the MyOwn business.

Protections extended to Whistleblowers under this policy potentially apply to disclosures made by our employees, contractors, service providers, vendors and suppliers, or their family members (discussed further at part 2.1).

## 1.3. Consultation

This Policy was produced following consultations with Legal, People and Culture, and Risk Champions from throughout AIAA's business.

# 2. Main Provisions

## 2.1. Making Protected Disclosures

### Who can be a Whistleblower?

Under Australian Law, Whistleblowers may be:

- our employees, contractors, or business associates;
- any employee of a third party that provides AIAA with goods or services; or
- a relative or dependent of any individual above.

What kinds of disclosures will be Protected Disclosures?

If you have reasonable grounds to believe that there is any misconduct (meaning a breach of law or regulation) or an improper state of affairs or circumstances that relates to AIAA or our connected entities, disclosing that matter in one of the ways described below will be a Protected Disclosure.

You do not need to know exactly which law or obligation has been breached as long as you reasonably believe it is an obligation of AIAA's, or relates to an improper state of affairs. Reasonableness depends on the circumstances of each case but, unless there is evidence to the contrary, we will assume any Whistleblower was acting reasonably by raising their concerns.

You are not required to investigate the matter personally or collect evidence to support your report. Reporting on a matter will begin an internal and independently monitored process of investigation described further below at 2.3.

## Are there any disclosures that won't amount to a Protected Disclosure?

Whistleblower protections are not extended by law to individuals who use Whistleblowing avenues to report on a personal work-related grievance. This means that if you voice a concern about a matter that:

- relates to your employment, former employment, and/or the choice to vary or cancel a contract with you, and
- that information doesn't relate to misconduct, alleged misconduct, an improper state of affairs and circumstances at AIAA,

then the matter will not be a Protected Disclosure.

That does not mean your concern should not be raised and cannot be escalated. Rather than being a Whistleblower matter, employment or contracting related concerns should be raised with your current or historical HR Business Partner, or for vendors and suppliers to the Procurement and Business Services Manager.

How can I make a Protected Disclosure?

AIAA supports your ability to make Protected Disclosures in several ways, all of which are totally confidential:

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| <p><b>Face-to-Face</b></p>                     | <p>Our Enterprise Risk team are subject-matter experts and contacting our Head of Enterprise Risk, Retail and Compliance is recommended to be your first step.</p> <p>Additionally, AIAA has designated the following roles as authorised persons that you may also safely raise your concerns with:</p> <ul style="list-style-type: none"> <li>• any member of the AIA Australia Exco;</li> <li>• any direct report of the AIA Australia Exco (excluding Executive Assistants);</li> <li>• any member of AIA Group Internal Audit;</li> <li>• your HR Business Partner;</li> <li>• any AIAA employee that is a recognised Actuary (meaning a Fellow, Associate, or Accredited Member of the Actuaries Institute of Australia or equivalent international body);</li> <li>• any Directors or Officers of the company, including the AIAA General Counsel or Company Secretary.</li> </ul> <p>When speaking to the above individuals, please raise from the outset that you are intending the disclosure to remain confidential, and/or you are intending to make a Whistleblower report. Anyone to whom a Protected Disclosure can be made has been provided with training and AIAA's Protected Disclosure Management Guide so that they understand and protect your rights as a Whistleblower, as well as knowing what next steps to take to bring your matter to the right place.</p> |
| <p><b>By calling the AIA Ethics Line</b></p>   | <p>You are welcome to report your concerns at any time (24/7, 365 Days) via phone call by calling the AIA Ethics Line: 1800 193 387.</p>  |
| <p><b>By using the AIA Ethics Website</b></p>  | <p>You are welcome to report your concerns online by visiting the AIA Ethics Line Website: <a href="http://www.aiaethicsline.com/">http://www.aiaethicsline.com/</a></p>  |
| <p><b>By emailing AIA Group Compliance</b></p> | <p>You can email AIA Group Compliance, including anonymously or through a pseudonym, by sending an email to <a href="mailto:compliance@aia.com">compliance@aia.com</a></p>  |

### How can I make an anonymous disclosure?

Disclosures made using the AIA Ethics Line can be anonymous simply by alerting the operator to the fact that you wish to remain anonymous. In all cases, your matter will be taken seriously, investigated and actioned. However, by remaining anonymous while using the AIA Ethics Line you are potentially unable to remain fully informed on the progress of the investigation or outcomes of your reporting as the operator and investigation teams will be unable to contact you following the call.

Unlike the Ethics Line, using the AIA Ethics Website enables you to remain totally anonymous in addition to giving you the ability to request and receive ongoing updates into the progress of the matter you have reported.

## 2.2. Protection for Whistleblowers

What Protections does the law extend to Whistleblowers and how does AIAA ensure Whistleblowers' Protection?

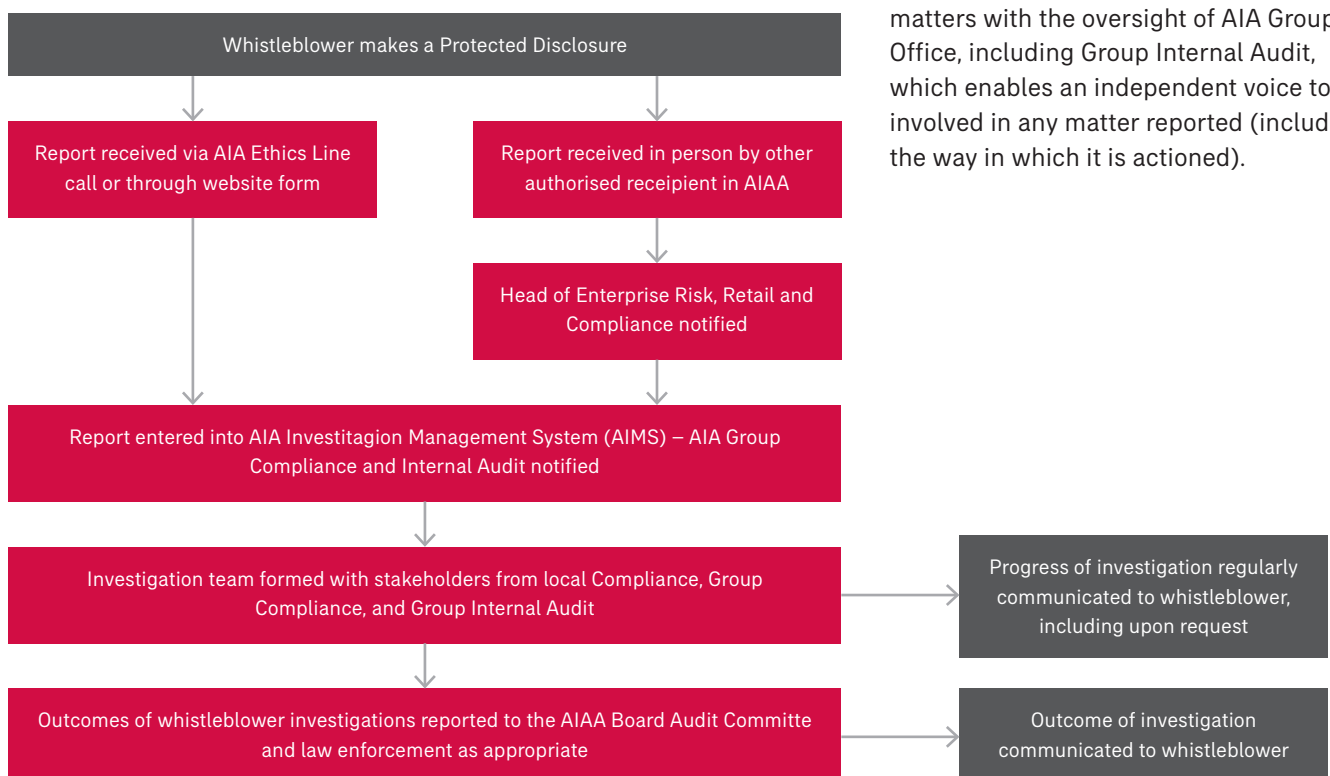
If you make a protected disclosure, you are entitled to the below protections:

- Your Identity will be kept confidential.

Both your identity and any information that is likely to lead to your identification will only be shared with investigators where it is reasonably necessary for the purposes of investigating the matter, and will not be shared with anyone else or for any other purpose.

- There is no retaliation for making a Whistleblower report. If you make a Protected Disclosure, you will be protected from any:
  - disciplinary processes – such as termination, changes being made to the substance of your role with AIAA, or other changes being made to your employment or engagement agreement – for making the disclosure;
  - civil, criminal, or administrative impacts: for example, AIAA must not seek to enforce any contractual or other remedies against you for making the disclosure; and
  - use of the disclosure as evidence against you in a criminal proceeding, except where that information is false.

AIA Australia manages all Whistleblower matters with the oversight of AIA Group Office, including Group Internal Audit, which enables an independent voice to be involved in any matter reported (including the way in which it is actioned).



## 2.3. Processes for Investigating Whistleblower Reports

### **What happens when a Report is made?**

AIAA takes all reports seriously. The following flow-chart helps you to understand who is involved in managing and investigating matters should you make a Protected Disclosure.

### **What happens if I am named in a Protected Disclosure made by someone else?**

AIAA ensures the fair treatment of the subjects of protected disclosures and any individuals to whom disclosures relate by having a well-trained and equipped Investigation team with members from both local and Group Compliance, and Internal Audit. Investigators are concerned with reviewing the substance of any allegations made in a Protected Disclosure prior to recommending any actions in response to a report.

### **What do I do if I am not seeing any progress since my report?**

You are encouraged to get into contact with the AIAA Head of Enterprise Risk, Retail and Compliance and/or Group Compliance to follow up on any report as required. We note that, depending on the complexity of the matter, investigations can take some time to be finalised.

If you have reported anonymously, please keep in mind the limitations that may impact our ability to keep you updated on the matter you have reported on. You are able to use further anonymous means (for example, a throwaway email address) to request updates on an anonymously reported matter provided you are able to adequately identify yourself as the same individual who lodged the initial Protected Disclosure.