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**WHISTLEBLOWING POLICY – THE NORTHERN TRUST COMPANY, MELBOURNE BRANCH AND ITS  
RELATED ENTITIES**

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**I. Policy Summary****A. Authority**

This Whistleblowing Policy (the “Policy”) supports implementation of the whistleblower protections under Part 9.4AAA of the Corporations Act 2001 (Cth).

**B. Statement of Purpose**

The objective of the Policy is to ensure that The Northern Trust Company, Melbourne Branch, and any related bodies corporate that is either domiciled in Australia or registered as a foreign company in Australia, collectively called ‘TNTCM and its related entities’, complies with its obligations under the Corporations Act 2001 (Cth), which provides protections to Eligible Whistleblowers, in relation to ‘Eligible Disclosures’, as defined in the Policy.

**C. Scope and Applicability**

This Policy applies to TNTCM and its related entities and its employees, past and present, permanent, and fixed term (including contractors, interns, and other temporary staff).

**D. Governing Body with Oversight**

This policy is owned by Compliance. This Policy is approved by the Australian Risk Management Committee (ARMC).

**E. Related Policies**

This Policy should be read in conjunction with the following related documents which can be found on One Book:

- [Northern Trust Reporting Procedures](#)
- [Code of Business Conduct and Ethics](#)
- [Standards of Conduct Policy](#)
- [Northern Trust's Conduct Risk Framework](#)
- [Asset Management Code of Ethics](#)
- [Global Anti-Fraud Policy](#)
- [Global Fraud Risk Program](#)

- [Global Anti-Money Laundering, Countering the Financing of Terrorism, and Countering Proliferation Financing Compliance Policy](#)
- [Global Anti-Money Laundering, Countering the Financing of Terrorism, Countering Proliferation Financing, and Economic Sanctions Framework](#)
- [APAC Financial Crime Compliance Policy](#)
- [Australia AML/CTF Program – Part A](#)
- [Global Anti-Bribery and Corruption Policy](#)
- [Global Anti-Bribery and Corruption Compliance Program](#)
- [Global Records and Information Management Policy](#)
- [Global Regulatory Change Framework](#)

#### **F. Effective Date**

This policy was reviewed and approved by the Australian Risk Management Committee (ARMC) on 17 May 2024 and noted by the Senior Officer Outside of Australia (SOOA) on 7 June 2024 and is effective as of 17 May 2024. The document is subject to a yearly review cycle unless there is a major regulatory change. The next review date is May 2025.

Whistleblowing Policy - The Northern Trust Company,  
Melbourne Branch, and its Related Entities

May 2024

## Version Control

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Note that Version 1.0 is the initial document. Each subsequent revision is assigned a version number, such as 1.1, 1.2 or, for major changes, 2.0.

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### Statement of Approval

This document was approved by the Australia Risk Management Committee on 17 May 2024 and noted by the Senior Officer Outside of Australia (SOOA) on 7 June 2024.

## Contents

<b>1</b>	<b>Introduction.....</b>	<b>7</b>
<b>2</b>	<b>Purpose of the Policy.....</b>	<b>8</b>
<b>3</b>	<b>Application of the Policy .....</b>	<b>9</b>
<b>4</b>	<b>Roles and Responsibilities.....</b>	<b>10</b>
<b>5</b>	<b>Application of the Policy .....</b>	<b>11</b>
5.1	Eligible Whistleblower .....	11
5.2	Eligible Disclosure .....	11
5.3	Eligible Recipient.....	12
<b>6</b>	<b>Making an Eligible Disclosure .....</b>	<b>13</b>
<b>7</b>	<b>Other Types of Concerns .....</b>	<b>15</b>
<b>8</b>	<b>Investigation Process .....</b>	<b>16</b>
<b>9</b>	<b>Protection of Confidentiality.....</b>	<b>18</b>
<b>10</b>	<b>Protection from Detriment or Retaliation .....</b>	<b>20</b>
<b>11</b>	<b>Other Protection for Whistleblowers .....</b>	<b>22</b>
<b>12</b>	<b>Support Available.....</b>	<b>23</b>
<b>13</b>	<b>Policy Administration .....</b>	<b>24</b>

# 1 Introduction

It is important to TNTCM and its related entities that any instances of misconduct, inappropriate or illegal behaviour, or any other unethical behaviour by individual employees of TNTCM and its related entities, is reported so that it may be dealt with in a proper and timely manner.

TNTCM and its related entities are committed to an honest and open culture in which Eligible Whistleblowers can raise any concerns without fear of reprisal and with confidence that their concerns are taken seriously and reviewed in an appropriate manner.

## 2 Purpose of the Policy

The Policy outlines TNTCM's and its related entities approach to managing Eligible Disclosures under Part 9.4AAA of the *Corporations Act 2001* (Cth).

The purpose of this policy is to encourage Eligible Whistleblowers to report suspected wrongdoing as soon as possible in the knowledge that they can raise any concerns without fear of reprisal and with confidence that their concerns are taken seriously and reviewed in an appropriate manner.

In addition, the aims of this Policy are:

- to set out the scope of protections for an Eligible Whistleblower;
- to provide guidance on how to raise concerns;
- to outline TNTCM's and its related entities investigation processes and mechanisms in place to support and protect Eligible Whistleblowers; and
- to reassure Eligible Whistleblowers that they will be able to raise concerns without fear of reprisals, even if they turn out to be mistaken.



### 3 Application of the Policy

This Policy applies to TNTCM and its related entities.

'Related entities', refers to each of TNTC, Melbourne, Northern Trust Securities Australia Pty Ltd "NTSA" and Northern Trust Asset Management Australia Pty Ltd, "NTAMA" that are bodies corporate and qualify as a regulated entity.

#### Publication of this Policy

This Policy will be made available both internally and externally on the [TNTC public Internet](#) site and OneBook.

## 4 Roles and Responsibilities

Role	Responsibility
<b>Investigator/Investigation team</b>	<ul style="list-style-type: none"> <li>Will be assigned by the Eligible Recipient to coordinate an investigation of an Eligible Disclosure.</li> <li>This will not be an individual connected to the subject matter of the disclosure in any way.</li> <li>May be internal or external to TNTCM, depending on the nature of the matter disclosed and, if internal, may be from Employee Relations (who report into Deputy General Counsel, Employment) or another member of the Legal Department, or Compliance, or Audit, or other relevant individual.</li> </ul>
<b>Senior Officer Outside of Australia (SOOA)</b>	<ul style="list-style-type: none"> <li>Reviewing periodic reporting.</li> </ul>
<b>Country Head and his/her delegates</b>	<ul style="list-style-type: none"> <li>Oversees implementation and effectiveness of the Policy.</li> <li>Point of escalation for issues arising under the Policy.</li> </ul>
<b>Line 2 Compliance</b>	<ul style="list-style-type: none"> <li>Oversees the implementation and effectiveness of the policy.</li> <li>Responsible for providing periodic reporting to the SOOA.</li> <li>Compliance is an independent control function within the second line of defence and will provide SOOA / Country Head and / or Business Units with advice and robust challenges with respect to Whistleblowing requirements.</li> </ul>
<b>Line 2 – MLRO</b>	<p>If the matter is suspected to be linked to a crime<sup>1</sup> a suspicious matter report must be lodged by the MLRO to AUSTRAC.</p>

<sup>1</sup> A financial crime relates to one of the following:

- Money laundering
- Terrorism Financing
- An offence against a Commonwealth, State or Territory law (including Bribery & Corruption and Sanctions evasions)
- Proceeds of crime
- Tax evasion

## 5 Application of the Policy

This Policy will apply to protect **Eligible Whistleblowers** making an **Eligible Disclosure** to an **Eligible Recipient**:



### 5.1 Eligible Whistleblower

An Eligible Whistleblower may be internal or external to TNTCM and its related entities, and located in Australia or overseas, such as current or former:

- employees (including temporary employees and secondees) and contractors of a Northern Trust Entity;
- officers and directors of a Northern Trust Entity;
- associates of a Northern Trust Entity; and
- service providers or suppliers of a Northern Trust Entity (whether paid or unpaid), as well as their employees.

It also covers disclosure by a relative, dependent or spouse of an Eligible Whistleblower.

### 5.2 Eligible Disclosure

An **Eligible Disclosure** is a report of information that the discloser has reasonable grounds to suspect concerns in relation to:

- Misconduct (e.g., fraud, negligence, default, breach of trust and breach of duty); or
- an improper state of affairs,

in relation to a Northern Trust Entity or a related body corporate of a Northern Trust Entity such as contraventions of Australian financial services laws, conduct that represents a danger to the public or financial system or certain criminal conduct.

It is important to note that a report may qualify for protection even if it is unsubstantiated or turns out to be incorrect.

The types of matters that may be protected include:

- Misconduct or an improper state of affairs or circumstances in relation to TNTCM, or a related body.
- TNTCM, its related bodies corporate or their officers or employees, engaging in conduct that:
  - constitutes an offence against, or a contravention of, a provision of any of the following:

- the Corporations Act;
- the Australian Securities and Investments Commission Act 2001;
- the Banking Act 1959;
- the Financial Accountability Regime Act 2023;
- The Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and the Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1);
  
- *the Financial Sector (Collection of Data) Act 2001;*
- *the Insurance Act 1973;*
- *the Life Insurance Act 1995;*
- *the National Consumer Credit Protection Act 2009;*
- *the Superannuation Industry (Supervision) Act;*
- *an instrument made under an Act referred to above;*
- *constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;*
- *represents a danger to the public or the financial system; or*
- Anything else prescribed by regulation.

Reports that are not Eligible Disclosures will not qualify for protection under this Policy or the Act. Personal work-related grievances are generally not considered Eligible Disclosures (see section 9).

### 5.3 Eligible Recipient

**Eligible Recipient** means:

- The Senior Officer Outside of Australia (SOOA);
- Country Head, Australia;
- Chief Compliance Officer, Australia;
- Chief Risk Officer, Australia;
- Head of Audit Services, APAC;
- the [Navex Global Hotline](#); or
- an individual nominated by Northern Trust to receive Eligible Disclosures.

Eligible Disclosures may also be protected when made to following:

- Australian-qualified legal practitioners, for the purpose of obtaining legal advice or representation in relation to the operation of Part 9.4AAA of the *Corporations Act 2001* (Cth); or
- ASIC, APRA and the ATO (for tax related concerns).

There are also special provisions for **emergency** and **public interest** disclosures to journalists and members of the Commonwealth, state or territory parliaments, where a disclosure has previously been made to ASIC, APRA, AUSTRAC or another prescribed body. There are specific criteria and time requirements which need to be met, and disclosers may wish to obtain independent legal advice prior to making such a report.

## 6 Making an Eligible Disclosure

Eligible Whistleblowers may make an Eligible Disclosure to an Eligible Recipient by email, telephone, letter or in person.

Eligible Whistleblowers may also make an Eligible Disclosure on a confidential and anonymous basis via the NAVEX Global Hotline using the following free of charge number from any phone: +1-800-515-168. This is a free of charge service managed on behalf of Northern Trust via NAVEX Global, an independent organisation, and is available 24 hours per day, 7 days per week.

All calls and disclosures to NAVEX Global will be treated in a confidential and sensitive manner to the fullest extent possible. The reporter will not be required to provide their name, and incoming calls do not display caller ID. If an Eligible Whistleblower requests to protect their identity, it will not be disclosed without their consent. Disclosures may also be made on an anonymous basis although certain concerns may be more difficult to investigate where information is given anonymously. Northern Trust strongly encourages individuals to disclose their identity to facilitate the concern raised being addressed and to enable support and protection to be provided.

NAVEX Global will take all relevant information relating to a concern and will relay this, on an anonymous basis where requested, to Northern Trust management for follow up. The reporter will be given a unique PIN number to use for status updates, or to receive follow up reports on actions taken by management as a result of their calls.

NAVEX Global may also be contacted from any computer via a confidential and secure website at [www.ntrs.ethicspoint.com](http://www.ntrs.ethicspoint.com). When an online report is submitted, a unique identification number will be provided, and the reporter will be requested to choose a PIN that will allow them access to the website for status or follow up reports on actions taken by management. There is no obligation or requirement to raise your concerns through any of the other available methods before contacting NAVEX Global. All calls and disclosures to NAVEX Global will be treated in a confidential and sensitive manner to the fullest extent possible.

Further details can be found in the Northern Trust Reporting Procedures or the TNTC Melbourne branch Partner Handbook. These options will also be made available on Northern Trust's public website to inform external Eligible Whistleblowers to their options.

TNTCM and its related entities encourage Eligible Whistleblowers to raise concerns through

internal processes or by using the Hotline in the first instance, where possible. However, nothing in this Policy is intended to restrict a person from raising a concern with a government agency, law enforcement body or a regulator in accordance with any relevant law, regulation or prudential standard applicable in a jurisdiction in which a Northern Trust Entity operates.

To assist TNTCM and its related entities to address a concern, it is important each Eligible Disclosure contains enough information to form a reasonable basis for an investigation, including:

- that the report is being raised pursuant to this Policy;
- the nature of the matter, and details regarding when and where it occurred;
- names of individuals believed to be involved;
- any supporting material or evidence; and
- any steps taken to report the matter elsewhere (if any).

## 7 Other Types of Concerns

The process outlined in section (8) applies to Eligible Disclosures. The following channels should be used to raise other types of concerns:

- Operational Risk and Compliance issues should be recorded in accordance with the Breach Management Policy.
- Health and Safety issues should be logged separately.
- Customer Complaints.
- Concerns such as discrimination, harassment or bullying, you may contact your manager, HR Business Partner, Employee Relations Consultant or Employee Relations Department at [Employee\\_Relations@ntrs.com](mailto:Employee_Relations@ntrs.com), or the Hotline.

Reports relating solely to 'personal work-related grievances' are generally not covered by this Policy. These are issues that tend to have implications for an individual personally, such as an interpersonal conflict between employees, a performance review, or a decision about the engagement, transfer, promotion, or disciplinary action of a particular individual. These concerns should be addressed by referring to the TNTCM and its related entities Partner Handbook and relevant procedures.

However, if the grievance has potentially significant implications for a Northern Trust Entity, includes information about misconduct beyond personal circumstances, or is with respect to detriment related to concern raised under this Policy, it may still qualify as an Eligible Disclosure.

## 8 Investigation Process

TNTCM and its related entities takes the raising of concerns seriously. All concerns are investigated fairly, objectively, and confidentially.

All reports will be initially assessed by the Eligible Recipient to confirm whether it qualifies as an Eligible Disclosure and determine whether a formal, in-depth investigation is required. Any investigation will be conducted in line with the relevant Whistleblowing investigation procedures, as detailed in the Whistleblowing Procedure document.

Where a report does not qualify as an Eligible Disclosure, it will be referred to an alternative channel in accordance with the appropriate policy and procedure rather than as a report under this Policy (see section 9).

Depending on the nature of the matter disclosed, an investigation may be conducted by internal or external investigators.

The time taken to conclude an investigation will vary depending on the complexity of the matter and amount of information available. TNTCM and its related entities endeavour to complete investigations within 90 days and where the expected timeframe will likely exceed this, an update will be provided to the Eligible Whistleblower where possible.

TNTCM and its related entities acknowledge the importance of ensuring procedural fairness to all individuals involved in an investigation. Where not precluded by confidentiality and if otherwise appropriate, persons to whom an Eligible Disclosure relates will be notified and given an opportunity to respond. The identity of an Eligible Whistleblower will not be provided without their consent.

The method of documenting the findings of an investigation will depend on the nature of the matter. Generally, the findings may be documented in a report, outlining the outcome of the investigation and a summary of evidence relied on. Any report or document prepared in relation to an investigation remains the property of the relevant Northern Trust Entity and will not be provided to the Eligible Whistleblower.

TNTCM and its related entities are committed to providing feedback to Eligible Whistleblowers wherever this is feasible and appropriate. It may not be appropriate to provide feedback where a Northern Trust Entity determines that it needs to keep the matter confidential for legal,



regulatory, or other reasons such as protecting the privacy or wellbeing of other individuals involved.

If an Eligible Whistleblower is not satisfied with the outcome of an investigation or is concerned that their Eligible Disclosure was not dealt with in accordance with this Policy, the matter can be escalated to the Deputy General Counsel, Employment for further consideration. An Eligible Whistleblower may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO, if they are not satisfied with the outcome of the entity's investigation.

## 9 Protection of Confidentiality

TNTCM and its related entities are committed to protecting and supporting Eligible Whistleblowers and all information received in connection with this Policy - including the fact that an Eligible Whistleblower has made an Eligible Disclosure - will be treated confidentially and sensitively.

TNTCM and its related entities have robust procedures in place designed to keep each Eligible Whistleblower's identity confidential. Different techniques may be used to do so, such as limiting access to documents, using pseudonyms, redacting personal information in documents, and adopting gender neutral terms. TNTCM and its related entities will ensure training and awareness of confidentiality requirements is provided to all persons involved in managing Eligible Disclosures.

Unless the eligible whistleblower consents, it is illegal for a person to disclose an eligible whistleblower's identity or any information that may lead to their identification (subject to the exceptions set out below).

An Eligible Whistleblower's identity will only be disclosed to those persons required to access records for the purpose of this Policy and will not be shared with any other person unless:

- the Eligible Whistleblower has consented; and/or
- the disclosure is required or permitted by law, including where a Northern Trust Entity makes a report to a relevant regulatory or law enforcement bodies including APRA, ASIC and AUSTRAC.

In the circumstances where it is reasonably necessary to share information that may identify an Eligible Whistleblower in connection with the management of an Eligible Disclosure, all reasonable steps will be taken to minimise the risk of that Eligible Whistleblower's identity being disclosed.

Eligible Disclosures may be made anonymously, and the Eligible Whistleblower may choose to remain anonymous for the duration of the investigation and after it has been finalised.

Anonymous reports will still be protected and will be investigated in the same way as other reports. However, there may be some practical limitations in conducting the investigations, such as the inability to contact the individual making the disclosure where further or clarifying information is required. TNTCM and its related entities strongly encourage individuals to disclose their identity to facilitate the concern raised being addressed and enable support and protection to be provided.

An Eligible Whistleblower may lodge a complaint about a breach of confidentiality with a regulator, such as ASIC, APRA or the ATO for investigation.

## 10 Protection from Detriment or Retaliation

TNTCM and its related entities are committed to protecting Eligible Whistleblowers. Protections from detriment are available under the law and it is an offence to cause detriment. No person may cause or threaten detriment in connection with an Eligible Disclosure made (or planned to be made) under this Policy.

Detriment may take many forms and includes but is not limited to:

- dismissal of an employee;
- injury of an employee in their employment;
- alteration of an employee's position or duties to their 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; or
- damage to a person's business or financial position.

TNTCM and its related entities may take disciplinary action, up to and including termination of employment or engagement for such retaliatory treatment or otherwise breached this Policy. In some circumstances, this conduct may also attract civil and/or criminal penalties.

Any individual who believes they have suffered detrimental conduct in breach of this Policy, should immediately report it through one of the Whistleblower reporting channels (see section 8). All concerns of detrimental conduct in breach of this Policy will be considered an 'Eligible Disclosure' for the purposes of this Policy.

There may be compensation available to individuals where a Northern Trust Entity has failed to take reasonable precautions and exercised due diligence to prevent detrimental conduct, and individuals may wish to seek independent legal advice.

Managing work performance issues in accordance with the TNTCM's and its related entities performance management procedures, or administrative action that is reasonable for the purpose of protecting an Eligible Discloser from detriment, will not amount to detrimental conduct.

Whilst TNTCM and its related entities encourages the raising of concerns in an open and honest culture, nothing in this Policy prevents TNTCM and its related entities, if appropriate, from taking action against individuals who have knowingly made false and vexatious disclosures.

## 11 Other Protection for Whistleblowers

Eligible Whistleblowers are protected from legal or disciplinary action being initiated against them in relation to making an Eligible Disclosure. This includes action against an Eligible Whistleblower for breach of contract or duty of confidentiality or prosecution for unlawful release of information.

However, if an Eligible Whistleblower implicates their own conduct when making an Eligible Disclosure or assisting in the process of an investigation, they will not have immunity from investigation or disciplinary action regarding this conduct.

## 12 Support Available

TNTCM and its related entities are committed to supporting Eligible Whistleblowers. Depending on the circumstances of the case and the individuals involved, steps taken to support Eligible Whistleblowers may include:

- (a) undertaking an assessment of the risk of detriment;
- (b) providing support through Employee Assistance Program at 1-300-361-008; and
- (c) assisting with strategies to help minimise and manage stress, time or performance impacts, or other challenges.

For Eligible Whistleblowers who are current employees, where it is necessary for that person's wellbeing, TNTCM and its related entities may offer:

- (a) a leave of absence whilst the Eligible Disclosure is investigated; or
- (b) to relocate the Eligible Whistleblower to a different team.

TNTCM and its related entities will extend as much support as reasonably practical to all Eligible Whistleblowers who raise a concern but may not be able to provide third parties with the same type or level of support as current employees.

## 13 Policy Administration

**Record Keeping:** All relevant documentation in relation to this Policy and any underlying procedures must be recorded and maintained in accordance with the Global Records and Information Management Policy. In addition, all documents and records relating to an Eligible Disclosure or related investigation must be stored securely and only be accessible to those persons required to access the records for the purposes of, and as permitted by, this Policy. Compliance is responsible for the maintenance of these documents and records.

**Oversight and Reporting:** Periodic reporting will be provided to the SOOA including a summary of material incidents raised (subject to confidentiality), metrics regarding number and nature of reports, and Whistleblower training completion rates. A report must be made at least annually to the SOOA on the operation and effectiveness of the systems and controls in relation to whistleblowing.

Additionally, the number of Eligible whistleblowing complaints will be shared with Compliance regularly as required for statutory reporting purposes. The report may include a summary of material incidents raised (subject to confidentiality), metrics regarding number and nature of reports and Whistleblower training completion rates. This reporting should be available to regulators on request.

**Compliance and Audit:** This Policy may be subject to Compliance Monitoring and Testing for adherence to regulatory requirements. Additionally, it may also be subject to an independent review by Internal Audit.

**Breaches:** Any instances of non-compliance with this Policy will be investigated. A breach of this Policy may result in disciplinary action up to and including dismissal or termination of employment or engagement, as applicable. All regulatory breaches should follow the local regulatory breach process, which will require completion of a breach form and appropriate actions to remediate. Serious breaches may require notification to the local regulator.

This Whistleblowing Policy must ensure that instances of non-compliance impacting the Fit and Proper Policy requirements, are identified and provisions are put in place to allow persons who have information that the APRA-regulated institution has not complied with this Prudential Standard to provide that information to APRA.

**Penalties / civil penalties for not complying:** ASIC is responsible for administering the whistleblower protection provisions in the Corporations Act, including the whistleblower policy requirement.



Periodically, ASIC may conduct surveillance activities to ensure compliance with the obligations and pursue non-compliance in accordance with ASIC'S enforcement approach and operational priorities.

Failure to comply with the whistleblower requirements as an Eligible Recipient and failure as a business to comply with the requirement have a whistleblower policy in place, as required, is an offence of strict liability with a penalty of 60 penalty units for individuals and companies (currently \$13,200), enforceable by ASIC.

**Regulatory Change:** In the case of a change to the statutory or regulatory requirements captured in this document, the changes are dealt with in accordance with the Regulatory Change Framework.

For queries regarding this Policy, please contact the Compliance team.