

Whistleblower

Purpose and scope

The purpose of this Policy and Procedure is to:

- Outline the Visy process available to facilitate and encourage the reporting of fraud, bribery, corruption or other improper conduct by employees, suppliers, customers and other third parties without fear of intimidation, disadvantage or reprisal.
- Provide information on a confidential and /or anonymous Helpline which can be used for reporting fraud, bribery, corruption or other improper conduct at Visy.
- Outline the type of information required when reporting an alleged incident at Visy.
- Outline the Visy fraud, bribery, corruption or improper conduct investigation and reporting process.
- Outline the measures Visy has in place to protect Whistleblowers.

This Policy and Procedure applies to any person or organisation who is an eligible Whistleblower and has any concern about fraud, bribery, corruption or improper conduct or non-compliance with Visy policies, procedures or applicable laws by any member of Visy's staff or management team or any of Visy's agents or contractors (**Visy Personnel**).

This Policy and Procedure is designed to support the Visy Anti Bribery and Corruption Policy. It should also be used in conjunction with all Visy's Policies and in particular the Visy Code of Conduct and Visy Corporate Ethics and Feedback Policy.

For applicable disclosures and Whistleblowers, there may be additional protections available under:

- the Corporations Act 2001 (Cth) (**Corporations Act**) (see Appendix I), which provides certain protections to Whistleblowers who disclose information in relation to misconduct or an improper state of affairs concerning Visy; and
- the Taxation Administration Act 1953 (Cth), which provides certain protections to Whistleblower on tax related matters.

Document owner

This Policy and Procedure is owned by the Visy Disclosure Officer.

Review date

This Policy and Procedure will be reviewed and any updates made on a periodic basis.

Policy

The Visy Group (**Visy**) are committed to conducting business in a professional, lawful and ethical manner. The Visy Code of Conduct is central to what Visy deems acceptable behaviour.

This Policy and Procedure is designed to complement normal reporting channels within Visy such as employee Line Management, Human Resources representatives, Health and Safety representatives, customer call centre etc. The Policy and Procedure is not intended to deal with general employment grievances or customer complaints. Grievances or complaints should be forwarded to the respective Direct Line Manager, Human Resources representative, Health and Safety Officer, Sales Manager (customers) etc. to address in the first instance.

Who does this policy apply to?

An eligible Whistleblower is a current or former:

- Visy officer
- Visy employee
- individual who supplies services or goods to Visy, and their employees
- individual who is an associate of Visy
- relative, spouse or dependent of any of the above.

Examples of Activities that may be reported under this Policy

The following activities are examples of activities that may be reported under this Policy and Procedure. Generally, activities that:

- Are fraudulent, including (but not limited to):
 - Falsification or alteration of accounting or other documents.
 - Theft of assets.
 - Suppression or omission of the effects of transactions from records or documents.
 - Recording of transactions without substance.
 - Misuse of private and confidential information for personal gain.
 - Misuse of Visy's resources for personal gain.
- Are unlawful, including (but not limited to):
 - Theft, drug sale/use, violent or threatened violence and criminal damage against property.
 - Conduct that is in breach of local or international law (including any breach in Australia of the Competition and Consumer Act 2010(Cth), State fair trading laws, Modern Slavery Act 2018 (Cth) or the Corporations Act 2001 (Cth) and in New Zealand, any breach of the Commerce Act 1986, the Fair Trading Act 1986, the Consumer Guarantee Act 1993) or Anti-Money Laundering and Counter-Terrorism Financing Act 2006.
- Are discriminatory, harassment, bullying, occupational violence, vilification or victimization, either forced or involuntary including (but not limited to):
 - Employment arrangements resulting from coercion, debt bondage and reduced freedom of movement, including denial of access to identification documentation.
 - Denial of reasonable work breaks, and excessive work hours outside those prescribed in legislation of the area of operation, or outside collectively negotiated employment agreements.
 - The unlawful employment of children.
 - Denying individuals fair and equal treatment in employment on grounds other than those relevant to the job requirements (Discrimination).

- The uninvited, unwelcome behaviour directed at another person which offends, humiliates or intimidates (Harassment).
- The repeated, unreasonable behaviour directed toward an employee, or group of employees, that creates a risk to health and safety (Bullying).
- Any incident where an employee is physically attacked or threatened in the workplace (Occupational Violence).
- Any act which is reasonably likely to offend, insult, humiliate or intimidate another person or a group of people, based on race, colour or national / ethnic origin (Vilification).
- Any threat or retribution following a real or possible complaint (Victimisation).
- Are a substantial risk to public health and safety or the health and safety of Visy employees, and employees of Visy's supply chain partners;
- Are a substantial risk to the environment;
- Are a substantial mismanagement of Visy resources;
- Involves engagement in outside interests, activities or investments which could interfere with the performance of duties or constitute a conflict of interest;
- Is an unresolved customer / supplier / staff complaint under the Corporate Ethics and Feedback Policy;
- Is conduct that is otherwise in breach of the Visy Code of Conduct and Visy Anti Bribery and Corruption Policy.

Purely personal work-related grievances, such as interpersonal conflict between two employees, will not generally amount to activity which may be reported under this Policy and Procedure, or protections under the Corporations Act. However, a personal work-related grievance may qualify for protection if it relates to:

- detriment that has been suffered, or is threatened, because an individual has raised a concern about suspected potential wrongdoing;
- both a personal work-related grievance and potential wrongdoing;
- the grievance is systemic in nature and involves or affects multiple employees;
- concerns that Visy has breached a law punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or information that suggests misconduct beyond the Whistleblower's personal circumstances;
- the discloser is seeking legal advice or legal representation about the operation of the Whistleblower protections under the Corporations Act.

How do I report a suspected instance of fraud, bribery, corruption or other improper conduct?

Visy encourages all eligible Whistleblowers to provide information about fraud, bribery, corruption, other improper conduct (each a Disclosable Matter) that may be occurring at Visy or a Visy supply chain partner.

If a person or organisation becomes aware of an incident or seeks assistance in relation to an incident which they reasonably believe constitutes a Disclosable Matter and considers the normal reporting channels to be inappropriate, then the person or organisation can contact Visy's independent, confidential and/or anonymous external helpline service provider – STOPline, or may report the Disclosable Matter by speaking with a direct line manager within Visy or to Visy's Head of Internal Audit & Risk Management by calling +61 417 560 329 or emailing rachel.pellow@visy.com.au. Visy encourages Disclosable Matters to be made in accordance with the above, however protected disclosures can also be made to additional bodies and entities as set out in the Corporations Act (See Appendix I).

Disclosures must be made to the above to qualify for protections.

For disclosures made to STOPline, the operators taking calls on this helpline are not associated with Visy. Operators are trained and experienced specialists dedicated to dealing with Whistleblowers and their concerns.

STOPline operators are available to take calls during business hours (0800 – 2000 Mon – Fri AEST). Any messages left will be responded to within one business day. You can also send your disclosure via the internet, email or mail. The Visy STOPline contact details are:

Phone toll free (Australia only):	1300 304 550
Calls from outside Australia (reverse charges):	+61 2 5500 7307
Email:	visy@stopline.com.au
Website:	www.visy.stoplinereport.com
Post:	Visy Case Manager c/o The STOPline P/O Box 403 Diamond Creek, Victoria 3089 AUSTRALIA

Disclosures can be made anonymously to an eligible Visy recipient or to STOPline. All letters will be followed up by STOPline to test the validity of the allegations.

All notifications will be treated in confidence to the maximum extent possible. A Whistleblower may choose to remain entirely anonymous. If the Whistleblower advises that they do not wish to reveal their identity, STOPline will not disclose the identity of the Whistleblower without consent or unless required to do so by law.

It is expected that any person or organisation who knows or suspects a potential Disclosable Matter or non-compliance with Visy policies, procedures or applicable laws by any member of Visy's Personnel will report them. Failure to report issues may result in Visy taking disciplinary action against Visy Personnel.

What type of information will be requested when calling STOPline or making a disclosure?

The STOPline operator or internal eligible Visy recipient will seek to gather and record sufficient detail about an alleged incident in order for Visy to properly investigate and respond. The following information may be requested:

- The Whistleblower's name, organisation and contact details (phone and address) - if prepared to give this information;
- The nature of the alleged incident;
- All relevant facts giving rise to the alleged incident;
- The name of the relevant Visy Department or business which is the subject of the alleged incident;
- The name(s) of all Visy personnel involved;
- An acknowledgement that the information provided by the Whistleblower:
 - Is a true and accurate representation of the events which have occurred and that have led to this alleged incident; and
 - Does not contain any misleading statements or omissions; and
- Whether the Whistleblower consents to disclosing their name (if provided) to Visy.

Whistleblowers should be made aware that it may be more difficult to investigate and take action in relation to a reportable incident that is made anonymously. Maintaining the anonymity of the Whistleblower's identity may also be difficult where the nature of the alleged incident points to a particular individual/s or where some disclosure is necessary as part of the investigation process.

In order to effectively carry out investigations, it may therefore be necessary to reveal (on a confidential basis) the nature of the notification made by the Whistleblower to those with a 'need to know'. This may involve disclosing the facts of the incident to an individual who may be the subject of the allegation, thereby ensuring that they are afforded an opportunity to defend themselves against the allegations. In such situations Visy will obtain consent to do so prior to disclosing.

What happens to the information provided to STOpline or an internal eligible Visy recipient?

Within one business day of receiving a notification, the STOpline representative, or internal eligible Visy recipient will acknowledge the Whistleblower's disclosure (either during the phone call or by email).

Once the representative has gathered sufficient information regarding an alleged incident, they will prepare a written record of all relevant data (known as a Disclosure Notice). The Disclosure Notice will be password protected and provided to the Visy Disclosure Officer with one business day – or other short period of time that has been agreed with the Whistleblower as being required to obtain additional information about the notification.

What is the process once a disclosure notice has been provided to Visy?

When the Visy Disclosure Officer receives a completed disclosure notice the Visy Disclosure Officer will:

- Assess the disclosure notice and depending on the nature of the incident, either:
 - Undertake an investigation; or
 - Prepare a report under this Policy and Procedure; or
 - If the incident does not relate to a Disclosable Matter, advise the relevant area e.g., Visy Complaints Handling Officer to record, investigate and report as required.
- Retain a file on the incident including dates, actions taken and outcomes;
- Inform the following persons (unless any of the individuals are themselves the subject of the allegations of a Disclosable Matter) of the disclosure notice received:
 - Group General Counsel;
 - Chief Executive Officer (who will brief the Chairman);
 - Chief Financial Officer;
 - Head of Internal Audit and Risk Management; and/or
 - Chief People Officer and Workplace Counsel.
- Regularly keep the Whistleblower up to date (either directly or through the STOpline operator) on the progress of the investigation either verbally or in writing.
- Once the investigation has been completed, advise the Whistleblower (either directly or through the STOpline operator) of the outcome of the investigation and where appropriate, any further actions that will be taken.

If the Whistleblower believes that this Policy and Procedure has not been followed or is of the view that the resolution of the notification has not been satisfactory, the Whistleblower may seek a review of the disclosure notice by contacting the Visy Chief Executive Officer as follows:

- Phone: +61 13 VISY (13 8479); or
- Via the website: www.visy.com , click on the 'enquire' button at the top of the page.

The Chief Executive Officer in consultation with the Group General Counsel will review the reasons presented as to why the Whistleblower believes the resolution of the notification is not satisfactory, the investigation process and relevant facts.

Following the review, the Chief Executive Officer, in consultation with the Group General Counsel, may have the investigation independently re-performed, recommend an alternative solution or inform the Whistleblower that they believe the incident has been resolved and no further action will be taken.

What is Visy's investigation process?

It is not uncommon for the possibility of a Disclosable Matter to be discounted by Supervisors or Managers as a one-off error. However, it is critical that all suspicions of a Disclosable Matters are immediately reported and followed up. Any delays could lead to increased financial loss, loss of evidence, failure to apprehend the perpetrator/s and a greater impact on staff morale and productivity.

All suspected occurrences of Disclosable Matters will be taken seriously and thoroughly investigated in line with the investigation guidelines set out below.

Investigators:

An Investigation Controller will be appointed for each investigation. The Investigation Controller (with the advice and assistance of Group General Counsel and the Chief People Officer and Workplace Counsel) will investigate the incident and identify, as far as possible, the loss to Visy, the scope and means of the fraud, bribery, corruption or improper conduct, the people involved and whether evidence can be obtained to conclusively prove the allegations or suspicions.

The Investigation Controller may carry out the investigation in either an overt or covert manner. The decision as to the nature of the investigation will be made by the Investigation Controller.

If the suspected Disclosable Matter is of a specific technical nature, appropriate technical experts will be seconded or sourced externally where required to supplement the internal resources (i.e., specialists with IT or forensic investigatory skills). The Investigation Controller will be allocated appropriate resources in order to adequately complete the investigation.

The Investigation Controller and/or Group General Counsel will, as appropriate, ensure the relevant Divisional Executive General Manager and/or Divisional General Manager Finance, Chief Financial Officer, Head of Internal Audit and Risk Management and the Chief People Officer and Workplace Counsel are kept up to date on the status of the investigation.

Interviews and Evidence:

Interviewing Visy Personnel to find out whether they have been a witness to, or involved in, a Disclosable Matter (particularly if it is criminal) is a specialist task. An interviewer, with knowledge of legal requirements, may undertake such interviews, under the supervision of representatives from the Visy Legal team and / or Human Resources. Where appropriate an external interviewer may be engaged. Under no circumstances will interviews be carried out on a one-to-one basis.

An audit trail of all relevant evidence, notes and documentation will be maintained.

Report:

Once the investigation has been completed, a written report on the alleged incident will be produced. The report will generally contain the following:

- Background to the alleged incident including:
 - Overview description of the allegation.
 - Persons involved including who is alleged to have committed the fraud, bribery, corruption or improper conduct.
 - Any loss to Visy or other party if known and relevant.
 - Locations where key activities relating to the alleged incident occurred.
 - Relevant dates and times including the timeframe in which the alleged fraud, bribery, corruption or improper conduct was committed.
- Approach taken including a summary of work performed to substantiate the claims, specialists involved etc.
- Detailed Allegation Description, Investigation Summary and Outcome.
- Conclusion and Recommendations including action required to prevent the alleged fraud, bribery, corruption or improper conduct re-occurring or to recover any identified losses.

The circulation of the report will be strictly controlled. As appropriate the report may be issued to the:

- Chief Executive Officer (who will brief the Chairman);
- Group General Counsel;
- Chief Financial Officer;
- Head of Internal Audit and Risk Management;
- Chief People Officer and Workplace Counsel; and/or,
- Executive General Manager and General Manager Finance of the relevant Visy Division.

- Supplier Risk Review Panel

Matters relating to fraud, bribery, corruption or improper conduct will be formally reported (whether or not a formal investigation is carried out) to the Group General Counsel who will report, where appropriate, to the Governance Board and / or the Competition and Consumer Law Compliance Committee.

What mechanisms does Visy have in place to protect Whistleblowers?

It is crucial that Whistleblowers reporting suspected instances of a Disclosable Matter are protected. Visy will seek to ensure that persons or organisations can raise their concerns without fear of victimisation and with the knowledge that their concerns will be adequately addressed. A Whistleblower will not be subject to any disciplinary action as a result of reporting a Disclosable Matter.

To assist, Visy has established an incident notification process whereby notifications can be provided to an independent external service provider (STOPline) confidentially and / or anonymously.

If a Whistleblower does not wish to reveal their identity when providing information about a Disclosable Matter, STOPline and/or Visy will protect their identity and will not disclose it without their consent, unless required by law to do so.

All Whistleblower notifications consented to will be treated in the strictest confidence. Use of information provided by a Whistleblower in a manner other than as set out in this Policy and Procedure; unauthorised disclosure of the identity of a Whistleblower who has reported an incident; or information from which the identity of the Whistleblower could be inferred, will be regarded as a disciplinary matter and will be dealt with in accordance with Visy's disciplinary procedures.

Visy will also ensure that any records relating to an alleged incident are stored securely and are only accessible to authorised staff.

Reprisals:

Visy will not tolerate any reprisals, or detrimental treatment such as dismissal, injury, discrimination, harassment, intimidation, harm or victimisation against any person suspected of making a report of an incident or against the Whistleblower's colleagues, employer (if a contractor) or relatives. Any such retaliatory actions by Visy Personnel will be treated as serious misconduct and will be dealt with in accordance with the Visy's disciplinary procedures.

Whistleblowers can seek compensation and other remedies through the court if (i) they suffer loss, damage, or injury because of a disclosure, and (ii) Visy failed to take reasonable precautions and exercise due diligence to prevent detrimental conduct. A Whistleblower will be protected from the following in relation to their disclosure (i) civil liability, (ii) criminal liability, and (iii) administrative liability. However, immunity is not granted for any misconduct a Whistleblower has engaged in which is revealed in a disclosure.

What is the disciplinary process for those found to be engaging in fraud, bribery, corruption or improper conduct?

As a general rule, any employee found to be engaging in a Disclosable Matter against Visy or another company in the course of his/her normal duties will be dismissed. Any employee found to be engaging in improper conduct may also be dismissed.

Depending on the circumstances, the matter may be referred to the relevant authorities, including the Police. Where there is sufficient evidence of criminal conduct, Visy will, following consultation with the Chief Executive Officer or the Chairman, the Chief Financial Officer, the Chief People Officer and Workplace Counsel and the relevant Divisional Executive General Manager and / or Divisional General Manager Finance (with advice from Group General Counsel or the Visy Legal Department) support the prosecution of those involved, either in the criminal or the civil courts, and in accordance with local legislation.

Who is the Visy media contact?

The decision to inform or respond to the media regarding any suspected or confirmed instances of a Disclosable Matter should only be taken by the Chief Executive Officer.

All press and media enquiries will be dealt with in line with Visy's Public Relations Policy.

How is the Visy Whistleblower Policy and Procedure and helpline communicated?

This Policy and Procedure is available on Visy's intranet site and on the Visy website: www.visy.com

All new employees, contractors, suppliers and customers will be made aware of this Policy and Procedure. Employees and contractors will be made aware of the Policy and Procedure as part of their induction process and will be referred to it during relevant ongoing compliance training.

Flyers providing the external service provider (STOpline) contact details will be made available on-site noticeboards.

Related Documents:

Visy Code of Conduct

Visy Anti Bribery and Corruption Policy

Visy Corporate Ethics and Feedback Policy

Visy Corrective Action and Disciplinary Policy

Visy Public Relations Policy

APPENDIX I: GLOSSARY

AFP:	Australian Federal Police.
ASIC:	Australian Security and Investments Commission.
APRA:	Australian Prudential Regulation Authority.
Bribery:	Bribery is an offer, promise, giving, demand or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Acts of bribery are designed to influence individuals to act dishonestly in the performance or discharge of their duty.
Corruption:	Corruption is the misuse of office or power or influence for private gain.
Disclosure Notice:	The written record of an alleged incident reported to the Visy Whistleblower hotline.
Fraud/Fraudulent:	<p>“Dishonest activity causing actual or potential financial loss to any person or entity including theft of monies or other property by employees or persons external to the entity and where deception is used at the time, immediately before or immediately following the activity. This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.</p> <p>The theft of property belonging to an entity by a person or persons internal to the entity but where deception is not used is also considered ‘fraud’”¹</p>
Improper Conduct:	Conduct that is in breach of the Visy Code of Conduct.
Supply Chain Partners	Companies and/or Individuals who supply services or goods to Visy, and their employees.
Visy Code of Conduct:	The standards of behaviour expected and required of all Visy employees, contractors, consultants working for, or undertaking work on behalf of Visy.
Visy Complaints Handling Officer:	The Visy representative responsible for investigating and following up Visy complaints.
Visy Investigation Controller:	The person allocated to formally investigate Visy bribery, corruption and improper conduct Disclosure Notices.
Visy Disclosure Officer:	The Visy representative responsible for receiving and managing Visy Whistleblower Disclosure Notices.
Whistleblower:	A person or organisation that reports alleged bribery, corruption and improper conduct.

¹ AS8001 – 2008 Fraud and Corruption Control

APPENDIX I: CORPORATIONS ACT

The Corporations Act provides special protection to eligible disclosures about misconduct or improper state of affairs relating to Visy. Nothing in this Policy and Procedure limits or excludes a disclosure's rights under the Corporations Act.

To be eligible for the protections under the Corporations Act, certain conditions need to be met, which are set out below.

Who can be a whistleblower?

To be eligible, a whistleblower needs to be, or have been:

- (a) an officer or employee of Visy;
- (b) an individual who supplies goods or services to Visy, or an employee of a person who supplies goods or services to Visy;
- (c) an individual who is an associate of Visy; or
- (d) a relative or dependent, or spouse of an individual referred to in (a) – (c) above.

While you must hold or have held one of these roles to access the protections, you do not have to identify yourself or your role, and you can raise your concerns anonymously.

Who must the disclosure be made to?

- To be eligible for protection, disclosure needs to be made to:
 - (a) an eligible recipient at Visy;
 - (b) an officer or senior manager of Visy;
 - (c) Visy's auditor, or member of an audit team of Visy;
 - (d) an actuary of Visy;
 - (e) a person authorised by Visy to receive disclosures, as set out in this Policy;
 - (f) APRA;
 - (g) ASIC;
 - (h) a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act even if the advice is to the effect that the disclosure does not relate to a disclosable matter.

While you must make your disclosure to one of these people or organisations, you can raise your concerns anonymously.

The Corporations Act also includes limited protections for disclosures to journalists or parliamentarians, which are set out below.

Subject of the disclosure

To be eligible for protection, you must have reasonable grounds to suspect that the information you are disclosing about Visy concerns:

- (a) misconduct, or
- (b) an improper state of affairs or circumstances.

This information can be about Visy, or an officer or employee of Visy, engaging in conduct that:

- (a) breaches the Corporations Act
- (b) breaches other financial sector laws enforced by ASIC or APRA
- (c) breaches an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months, or
- (d) represents a danger to the public or the financial system.

'Reasonable grounds' means that a reasonable person in your position would also suspect the information indicates misconduct or a breach of the law.

Confidentiality

If a report is made, the identity of the discloser must be kept confidential unless one of the following exceptions applies:

- (a) the discloser consents to the disclosure of their identity;
- (b) disclosure of details that might reveal the discloser's identity is reasonably necessary for the effective investigation of the matter;
- (c) the concern is reported to ASIC, APRA, or the AFP; or
- (d) the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

Disclosures may be made anonymously and the discloser may choose to remain anonymous and remain protected under the Corporations Act.

Protections

If the above conditions are met, then the Corporations Act protects a whistleblower against certain legal actions, including:

- (a) criminal prosecution (and the disclosure cannot be used against the whistleblower in a prosecution, unless the disclosure is false)
- (b) civil litigation (such as for breach of an employment contract, duty of confidentiality, or other contractual obligation),
- (c) administrative action (including disciplinary action),
- (d) in some circumstances, the reported information is not admissible against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty.

If you are the subject of an action for making a whistleblower disclosure, you may rely on this protection in your defence. This protection does not grant immunity to you for any misconduct that you were involved in that is revealed in the disclosure.

A whistleblower has protection from anyone who causes or threatens to cause detriment to a whistleblower or another person in the belief or suspicion that a report has been made, or may have been made, proposes to or could be made, may be guilty of an offence and may be liable for damages.

- A whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary, and the person receiving the report commits an offence if they disclose the substance of the report or the whistleblower's identity, without the whistleblower's consent, to anyone except ASIC, APRA, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report.

Public Interest Disclosures and Emergency Disclosures

In addition to the protections outlined above, a person may be protected if they make a public interest disclosure or an emergency disclosure in accordance with the relevant statutory regime. There are specific criteria which must be met in order to make these disclosures, and we recommend you seek independent legal advice.

Public Interest Disclosure

A 'public interest disclosure' (as at the date of this Policy and Procedure) is the disclosure of information to a journalist or a parliamentarian, where:

- at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation.
- the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
- the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- before making the public interest disclosure, the discloser has given written notice to the body to which the previous disclosure was made (either APRA or ASIC) that (i) includes sufficient information to identify the previous disclosure, and (ii) states that the discloser intends to make a public interest disclosure.

Emergency Disclosure

An 'emergency disclosure' (as at the date of this Policy and Procedure) is the disclosure of information to a journalist or parliamentarian, where:

- the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- the discloser 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;

- before making the emergency disclosure, the discloser has given written notice to the to which the previous disclosure was made that (i) includes sufficient information to identify the previous disclosure, and (ii) states that the discloser intends to make an emergency disclosure; and
- the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.