

# Whistleblower Policy

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## 1. PRINCIPLES

The Medibank Private Limited (**'Medibank'**) Whistleblower Policy (**'Policy'**) and Medibank's whistleblower hotline, Medibank Alert, reflect Medibank's commitment to the effective identification, disclosure and investigation of Reportable Conduct (as defined below) by:

- encouraging people to speak up if something isn't right; and
- protecting and supporting whistleblowers by ensuring appropriate protections are in place to prevent their identification, victimisation or disadvantage in response to making a report.

Medibank recognises that, in some instances, procedures outlined in this document and the Policy will apply to reports of Reportable Conduct made by Eligible Persons who are covered by the whistleblower protection provisions contained in the *Corporations Act 2001* (Cth) and other applicable legislation, as amended from time to time. Nothing in this document or the Policy is intended to detract from or diminish the rights or protections afforded to individuals by the provisions of that legislation.

## 2. SCOPE

### 2.1. This policy applies as follows:

The following people may make a disclosure under the Policy (**'Eligible Persons'**):

- a) current or former officers, directors or employees of Medibank or its subsidiaries;
- b) suppliers of goods or services, contractors (including a contractor for the supply of services or goods or any employee of the same), sub-contractors and employees of outsourced providers to Medibank;
- c) individuals associated with Medibank (including agents or volunteers); and
- d) relatives or dependents of any of the above persons.

### 1.1. What conduct can be disclosed?

Medibank encourages the disclosure of any instances of Reportable Conduct that they have reasonable grounds to believe have occurred or are occurring.

**'Reportable Conduct'** includes, but is not limited to:

- a) Theft;
- b) fraud, bribery or corruption;
- c) serious breaches of policies or procedures;
- d) illegal activities;
- e) unethical behaviour, including breaches of the Code of Conduct;
- f) non-declared conflicts of interest;
- g) giving or receiving gifts outside of guidelines;
- h) workplace safety hazards or unsafe work practices;
- i) insider trading;
- j) breach of trade sanctions or other trade controls;
- k) unauthorised use of Medibank's confidential information;
- l) conduct likely to damage the financial position or reputation of Medibank;
- m) any other improper conduct; or
- n) deliberate concealment of any of the above.

Reportable Conduct does not include personal work-related grievances, such as grievances regarding employment (or former employment) that have (or may have) implications for the discloser personally. Examples of personal workplace grievances include interpersonal conflicts between the discloser and another employee, decisions relating to the employment or engagement of an individual, transfer or promotion of the discloser, decisions relating to the terms and conditions of engagement of the discloser, and decisions to suspend or terminate the engagement of the discloser or otherwise to discipline the discloser, where such conduct is not taken due to a report of Reportable Conduct being made.

## 1.2. How can an Eligible Person disclose wrongdoing?

An Eligible Person may make a disclosure of Reportable Conduct to Medibank Alert, which is an independently monitored reporting service operated by Deloitte.

Medibank Alert can be accessed via one of the channels below:

- Phone: 1800 453 411
- Online: [www.medibankalert.deloitte.com.au](http://www.medibankalert.deloitte.com.au)  
(username: medibank; password: medibank#1)
- Email: [medibankalert@deloitte.com.au](mailto:medibankalert@deloitte.com.au)
- Postal: Medibank Alert Reply Paid 12628 A'Beckett Street, VIC 8006

Whistleblower legislation includes further categories of individuals employed or engaged by Medibank who can receive reports of certain types of alleged misconduct. Please refer to the applicable legislation for further details.

## 2. PROTECTIONS

### 2.1. Support and protections are available to Whistleblowers

Medibank is committed to protecting and respecting the rights of Eligible Persons who make a disclosure of Reportable Conduct to Medibank Alert ('**Whistleblowers**'). Medibank will take ensure appropriate protections are in place to protect Whistleblowers from identification, victimisation or disadvantage as a response to making reports.

A Whistleblower must not be subjected to Detriment because they have disclosed a matter. '**Detriment**' includes dismissal, injury in employment, alteration of duties to disadvantage, discrimination, harassment, intimidation, harm or injury, damage to property, damage to reputation, damage to business or financial position, or any other damage to a person.

Any person engaged in, or who could reasonably be perceived to be engaged in, conduct causing Detriment may be subjected to disciplinary measures.

A person who believes they, or their family, has been subjected to Detriment as a result of disclosing any Reportable Conduct should immediately report the matter via Medibank Alert.

### 2.2. Anonymity and confidentiality

Where a Whistleblower reports an instance of Reportable Conduct under the Policy, their identity will not be disclosed unless it is:

- a) consented to by the person making the report;
- b) required by law;
- c) necessary to prevent or lessen a serious threat to another person's health and safety;
- d) necessary to protect or enforce Medibank's legal rights or interests, or to defend itself against any claims;
- e) made to any government authority or agency or any regulator which Medibank reports to;  
or
- f) made to a member of the police force.

Choosing to remain anonymous does not impact the ability of a Whistleblower to access updates or continue to communicate with Whistleblower investigation officers.

The identity, or information that may lead to the identification, of a Whistleblower will be held in the strictest confidence and not disclosed to parties unrelated to the investigation.

However, it may be disclosed to the following parties or under the following circumstances:

- a) ASIC;
- b) APRA;
- c) a member of the Australian Federal Police;
- d) a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of this Part; or
- e) where the discloser consents to their identification.