

Whistleblowing Policy

HOWDEN

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1. Introduction

It is important to Howden Pacific Holdings Pty Ltd and its related bodies corporate (**Howden**) that any fraud, misconduct or wrongdoing involving Howden is reported and properly managed. Howden therefore encourages all individuals to openly and confidently raise any concerns that they may have, about the conduct of others in the business, or the way in which the business is run. The purpose of this policy is to set out the way in which individuals may raise any such concerns that they have, the significant protections available to a person raising those concerns, and how those concerns will be dealt with in Howden's businesses in Australia and New Zealand.

This policy applies to all full time and part time employees of Howden and others performing functions in relation to the organisation, such as agency workers and contractors.

In Australia, these individuals and/or parties are defined as **"Eligible Whistleblowers"**. An **"Eligible Whistleblower"** means an individual who is, or has been, any of the following:

- (a) an officer or employee of Howden (e.g. current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers and directors);
- (b) a supplier of services or goods to Howden (whether paid or unpaid) including their employees (e.g. current and former contractors, consultants, service providers and business partners);
- (c) an associate of Howden; or
- (d) a relative, dependant or spouse of an individual referred to in the above paragraphs (a) to (c).

In New Zealand, the whistleblowing regime applies only to a **"Discloser"**, who is or was formerly an employee, secondee, volunteer, officer or director of a company, and in certain cases also to the Discloser's relatives or associates. A person who discloses information in support of, or relating to, a protected disclosure also has access to certain protections under the New Zealand regime. For the purposes of this policy, this collective group of protected individuals is included in the definition of **"Discloser"**.

This policy is not contractual and Howden reserves the right to amend the policy should it, in its sole discretion, elect to do so. A breach of this policy will be treated as a serious matter and may be grounds for disciplinary action.

The policy will be available on HowdenHub for all Howden employees, included in all new starters employee induction information packs and accessible on Howden's publicly available website.

2. Principles

This policy is owned by and approved annually by the board of Howden, demonstrating its commitment to creating and maintaining a culture of openness within Howden. The policy reflects the following principles:

- everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Individuals should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of. Individuals should also be able to report it knowing that Eligible Whistleblowers/ Disclosers will be afforded a range of protections if they disclose in accordance with this policy;
- any matter raised under this policy will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the Eligible Whistleblower/ Discloser who raised the issue;
- no individual will be subjected to retaliation or victimisation for raising a matter under this policy.

This means that the Eligible Whistleblower/ Discloser will have protections against retaliation, victimisation and mistreatment, and the Eligible Whistleblower/ Discloser's continued employment and opportunities for future promotion or training of the individual will not be prejudiced because he/she has raised a legitimate concern;

- victimisation or retaliation against an Eligible Whistleblower/ Discloser for raising a matter covered by this policy will be a disciplinary offence;
- if misconduct is discovered, including any disclosure made in bad faith (in New Zealand), as a result of any investigation under this policy, Howden's disciplinary procedure will be used, in addition to any appropriate external measures;
- maliciously making a false allegation is a disciplinary offence; and
- an instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, individuals should not agree to remain silent.

if your concern relates solely to a personal work-related grievance, it is unlikely to be covered by this policy or qualify for whistleblowing-type protections under the provisions of the *Corporations Act 2001* (Cth) (**Corporations Act**) and the *Tax Administration Act 1953* (Cth) (**Tax Act**) in Australia, or the (relatively similar) protections under the New Zealand *Protected Disclosures (Protection of Whistleblowers) Act 2022* ("**NZ Whistleblowers Act**").

In Australia, a "personal work-related grievance" is defined under the Corporations Act and refers to matters related to an individual's current or former employment (e.g. employment arrangements, performance, pay or personal circumstances) that have implications for the individual personally but do not have significant implications for Howden or relate to any conduct, or alleged conduct referred to under section 3 of this policy.

For instance, an interpersonal conflict between you and another employee, a decision about your employment that does not breach workplace laws or a decision about the engagement, transfer or promotion is considered a personal work-related grievance.

However, such reports may be protected under other legislation such as the *Fair Work Act 2009* (Cth). If you have a personal work-related grievance you would like to raise, please discuss this with your manager in the first instance. If you are not comfortable raising the work-related grievance with your manager, you can escalate the matter to the Human Resources manager.

New Zealand has a similar distinction between employment-related personal grievances (which don't come under this policy) and whistleblowing disclosures under this policy. In New Zealand, "personal work-related grievances" and disputes or conflicts of an employment-related nature are usually dealt with under the individual's employment agreement and the *Employment Relations Act 2000* (NZ).

3. Policy

Disclosable Matters

The law provides protection for those who raise legitimate concerns about specified matters. These are called "**Disclosable Matters**" and are covered by this policy.

"Disclosable Matters" under Australian Law:

In Australia, a Disclosable Matter is one where an individual has reasonable grounds to suspect that there is conduct, or a state of affairs which exists, in relation to Howden that constitutes any of the following:

- misconduct (e.g. fraud, negligence, default, breach of trust and breach of duty) or an improper state of affairs;
- misconduct or an improper state of affairs or circumstances, in relation to the tax affairs of Howden or an associated company, where the Eligible Whistleblower considers the information may assist the recipient to perform the functions or duties in relation to the tax affairs of Howden;
- Howden or any of its officers or employees has engaged in conduct that constitutes an offence against or a contravention of a provision of:
 - the *Corporations Act*;
 - the *Australian Securities and Investments Commission Act 2001* (Cth);
 - the *Banking Act 1959* (Cth);
 - the *Financial Accountability Regime Act 2023* (Cth);
 - the *Financial Sector (Collection of Data) Act 2001* (Cth);
 - the *Insurance Act 1973* (Cth);
 - the *Life Insurance Act 1995* (Cth);
 - the *National Consumer Credit Protection Act 2009* (Cth);
 - the *Superannuation Industry (Supervision) Act 1993* (Cth);
 - the *Tax Act*, or
 - an instrument made under any Act referred to above.
- conduct that constitutes an offence against any other law of the Commonwealth punishable by imprisonment for more than 12 months.

“Disclosable Matters” under New Zealand Law:

In New Zealand, “Disclosable Matters” are where the Discloser believes on reasonable grounds that there is, or has been, “serious wrongdoing” in or by the Discloser’s organisation.

A “serious wrongdoing” is any act, omission or course of conduct that is:

- an offence (i.e. illegal);
- a serious risk to public (or individual) health or safety, or the environment;
- a serious risk to the maintenance of law (including the prevention, investigation and detection of offences or the right to a fair trial); and/or
- an unlawful, corrupt or irregular use of public funds or resources.

It is not necessary for the disclosing individual to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. However, providing supporting information if possible, is encouraged. The disclosing individual has no responsibility for investigating the matter - it is Howden’s responsibility to ensure that an investigation takes place as set out in section 5 of this policy below.

Any matters outside of the Disclosable Matters as outlined above should initially be escalated to your manager in the first instance. If you are not comfortable raising the work-related grievance with your manager, you may escalate your concerns to the Human Resources Manager.

Examples of Disclosable Matters

It is also important to note that Disclosable Matters do not necessarily have to involve a contravention of any particular law.

Examples of Disclosable Matters that can be reported under this policy include, but are not limited to:

- fraud (including dishonest activity, misappropriation of funds, or covering up fraud in financial reports);
- corrupt behaviour (for example: bribery or dishonestly taking advantage of an employment position);
- legal or regulatory non-compliance;
- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence and criminal damage against property;
- enabling money laundering or breach of anti-money laundering or counter-terrorism financial laws;
- conduct endangering health and safety or causing damage to the environment;
- conduct likely to damage the reputation of Howden;
- information that indicates a significant risk to public safety;
- taking or threatening to take detrimental action against a person who has made a disclosure or is suspected to have made, or planning to make a disclosure;
- deliberate concealment of information tending to show any of the matters listed above; and
- harassment, discrimination, victimization, or bullying (other than personal work-related grievances as defined in the Corporations Act in Australia, or under the Employment Relations Act in New Zealand, as explained in section 2 above).

4. Procedure

In this section, we detail who an Eligible Whistleblower/ Discloser can report wrongdoing to, and the process for doing so.

Eligible Recipients

An individual to whom this policy applies should report Disclosable Matters to the following persons who are **“Eligible Recipients”** for the purposes of this policy:

- (a) your manager at Howden;
- (b) the Chairman or Chief Executive Officer of Howden;
- (c) the Head of your business division;
- (d) a Senior Member of Human Resources at Howden;
- (e) Regional General Counsel of Howden;
- (f) Howden’s independently Appointed Auditor;
- (g) Howden’s independently Appointed Actuary; and
- (h) the independent confidential reporting line, Safecall.

Eligible Recipients and Appropriate Authorities under the NZ Whistleblowers Act

Under the NZ Whistleblowers Act, a Discloser can report a Disclosable Matter to either:

- their organisation via one of the Eligible Recipients; or alternatively
- to an **“Appropriate Authority”** (at any time).

The **“Appropriate Authorities”** are defined and listed under the NZ Whistleblowers Act. They include the following key organisations.

- The Ombudsman;

- Commissioner of Police;
- Director of the Serious Fraud Office;
- Inspector-General of Intelligence and Security (if the protected disclosure relates to classified information); and/or
- the “Appropriate Authorities” also includes the head of any public sector organisation; any officer of Parliament; and includes the membership body of a particular profession, trade, or calling where such body has the power to discipline its members. Please note however that it does not include a Minister or a member of Parliament in the first instance.

In addition to the list of Appropriate Authorities above, the schedules of the NZ Whistleblowers Act also give a more extensive list of other Appropriate Authorities that you can report to at any time.

The Reporting Procedure:

In Australia: Wherever possible, an individual should follow steps one to five below as the procedure for reporting Disclosable Matters to Eligible Recipients in Australia.

In New Zealand: You may either report the issue to any of the Eligible Recipients identified above and outlined in steps one to five below or to an Appropriate Authority.

Step One

In the first instance (subject to step two), any concerns should be raised with your manager. Your manager will arrange an investigation into the matter (either by investigating the matter him/herself or immediately passing the issue to another one of the other Eligible Recipients). The investigation of your complaint by Howden will be conducted in accordance with section 5 of this policy.

Step Two

If you believe your manager to be involved in the (suspected) wrongdoing, or for any reason, you do not wish to approach your manager, then you can make a whistleblower report by way of email, telephone or in person to any of the following Eligible Recipients.

- (a) the Chairman or Chief Executive Officer of Howden;
- (b) the Head of your business division;
- (c) a Senior Member of Human Resources of Howden;
- (d) Regional General Counsel of Howden;
- (e) Howden’s independently Appointed Auditor; or
- (f) Howden’s independently Appointed Actuary (if applicable).

If you would like to obtain further information regarding making a whistleblower report, you can also contact any of named Eligible Recipients referred to above.

Step Three

If you are concerned that your manager or the Eligible Recipient(s) to whom you disclosed is/are involved in the wrongdoing, have failed to make a proper investigation or have failed to report the outcome of the investigation to the Regional General Counsel to refer to the board, you should inform a senior member in Human Resources, who will arrange for another manager to review the investigation carried out, make any necessary enquiries and make their own report to the board. Any approach to the Human Resources team in accordance with this step 3 will be treated in the strictest

confidence and your identity will not be disclosed without your prior consent to ensure that your disclosure is kept anonymous.

Step Four

Where the matter is more serious, or you feel that your manager or Human Resources has not addressed your concern, or you prefer not to raise it with them for any reason, you should liaise with the independent confidential reporting line, Safecall. Safecall is a confidential reporting service where you can raise your concerns and be assured they will be fully addressed. Calls are handled by skilled staff and will be treated in complete confidence.

If you wish to remain anonymous, Safecall will not disclose your name (see section 6 of this policy below for further details on anonymous reports and confidentiality). You can contact Safecall at any time on the Freephone numbers listed below.



The Safecall phone line is available 24/7, 365 days a year on the Freephone numbers listed below:

Australia: 1800 312 928
China Unicom: 10800 744 0605
China Telecom: 10800 440 0682
Hong Kong: 3077 5524
India: 000 800 440 1256
Indonesia: 001 803 440 884
Korea Telecom: 001 800 7233 2255
Korea DACOM: 002 800 7233 2255
Macau: 00800 7233 2255
Malaysia: 1800 220 054
New Zealand: 00 800 7233 2255
Philippines: 1800 144 10499
Singapore: 800 448 1773
Taiwan: 00800 7233 2255
Thailand: 001 800 7233 2255

A report of the call to Safecall will be sent to the Regional General Counsel in addition to secondary support (where required) from Howden's internal lawyers. Where independence cannot be ensured, a third party e.g. external solicitors will be engaged to perform the investigation and opine on the recommended course of action.

Step Five

If on conclusion of all of the above steps (as appropriate), you reasonably believe that the appropriate action has not been taken, you can report the matter to a legal practitioner (for the purposes of obtaining legal advice or representation) or to the proper regulatory body.

In New Zealand you have the right to make the disclosure to an Appropriate Authority at any time. That even applies if you have already made the disclosure to an Eligible Recipient at Howden (and applies if you are still waiting on the outcome from Howden, or have received the outcome and are dissatisfied with it).

The legislation sets out a number of regulatory bodies to which reports of Disclosable Matters may be made.

Australia

In Australia, these include:

- The Australian Securities and Investments Commission (**ASIC**);
- The Australian Prudential Regulation Authority (**APRA**); or
- The Australian Taxation Office (**ATO**) (where the matter is tax-related).

In certain and limited instances, you are permitted to disclose information to a journalist or parliamentarian in Australia as a “public interest disclosure” or “emergency disclosure” as outlined below. However, it is imperative that you understand the gravity of making a public interest or emergency disclosure. Before proceeding with such a disclosure, it is strongly advised that you first seek independent legal advice, as the criteria (as set out below) for such disclosures are very specific and must be adhered to:

Public Interest Disclosure

- you must have previously made a disclosure to ASIC, APRA or the ATO;
- 90 days must have passed since you previously made the disclosure to ASIC, APRA or the ATO; and
- you do not have reasonable grounds to believe that action is being, or has been taken, to address the matters related to your disclosure; and
- you have reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- at the end of the period referred to in the second bullet point above, written notice has been given by you to the relevant regulatory body to which you previously made the disclosure that:
 - includes sufficient information to identify the previous disclosure; and
 - states that you intend to make a public interest disclosure,
- the public interest disclosure is made to a member of the Parliament of the Commonwealth, Parliament of a State or legislature of a Territory, or a journalist; and
- the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the parliamentarian or journalist of the misconduct or the improper state of affairs or circumstances.

Emergency Disclosure

- you must have previously made a disclosure to ASIC, APRA or the ATO;
- you must have 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;
- written notice has been given by you to the relevant regulatory body to which you previously made the disclosure that:
 - includes sufficient information to identify the previous disclosure; and
 - states that you intend to make an emergency disclosure; and
- the emergency disclosure is made to a member of the Parliament of the Commonwealth, Parliament of a State or legislature of a Territory, or a journalist; and
- the extent of the information disclosed in the emergency disclosure is no greater than necessary to inform the parliamentarian or journalist of the substantial and imminent danger.

5. Handling and Investigating a Disclosure

Howden will investigate all whistleblower reports made to it and will do so in accordance with this policy and with its obligations under the law in Australia and New Zealand. If you can be contacted and subject to confidentiality and privacy considerations, we will keep you informed of when the investigation process has begun, while the investigation is in progress and after the investigation has been finalised.

After receiving a whistleblower report, Howden will assess the information provided to determine whether it is a **“Protected Report”**, how it will be handled and whether an investigation is required.

For the purposes of this policy, **“Protected Report”** means a report that falls within the scope of matters described in this policy:

- (a) is made by an Eligible Whistleblower/ Discloser;
- (b) is made through one of the reporting options specified in this policy; and
- (c) contains information, based on reasonable grounds, that concerns wrongdoing in relation to Howden.

Howden’s response to a whistleblower report will vary depending on the nature of the report and the amount of information provided. The precise steps to be taken to investigate a report will differ in individual cases but may include:

- where independence cannot be ensured, a third party, e.g. external solicitors will be engaged to perform the investigation and opine on the recommended course of action;
- determining the nature and scope of an investigation;
- appointing an internal or external investigator (if an investigation is required), who can conduct an investigation in a fair, objective, and independent manner;
- the investigator or other person asking the Eligible Whistleblower/ Discloser whether they consent to their identity being disclosed to investigate the whistleblower report;
- interviewing the Eligible Whistleblower/ Discloser or any other relevant person to obtain information about the report;
- reviewing relevant documents and other information in relation to the report; and
- the investigator making findings regarding the conduct reported.

Generally, if you can be contacted, we will confirm receipt of your disclosure within 2 business days. The investigation of a Protected Report will commence as soon as reasonably possible from the date we receive it. If we think there might be a delay with the investigation, we will tell you (if possible).

Once the investigation process is complete, the report will be sent to the Regional General Counsel of Howden in addition to secondary support (where required) from Howden’s internal lawyers who will be independent from the initial investigation conducted by the business. The Regional General Counsel will then provide the report to the board of Howden on a “no names” basis to maintain the confidentiality of matters raised under this policy. Once received, the board of Howden, if applicable will take action in relation to the report. Action can include but is not limited to:

- reporting the names to any appropriate government department and/or regulatory agency;
- referring the matter to Howden Human Resources team to instigate the disciplinary procedure, which may involve:

- taking disciplinary action; and
- conducting training of the individual(s) named in the report; or
- referring the matter to the Howden Legal team to address any internal policy deficiencies.

On conclusion of any investigation (if possible) you will be told the outcome and what the board of Howden has done, or proposes to do, about your report. If no action is to be taken, the reason for this will be explained to you.

Internal Reviews

If you make a Protected Report or are the subject of a Protected Report and you are not satisfied with the outcome, you may ask for an internal review of our decision following the completion of the investigation process. Internal reviews will be directed to a member of the Howden Legal team, who was not involved in the initial investigation. We may refuse to conduct an internal review if no new information is available or if the new information does not change the outcome.

External Review Options

In Australia, if you are not satisfied with our response, you may lodge a report or complaint with ASIC, APRA or the ATO (for tax-related matters).

In New Zealand, if you are not satisfied with our response or the response of an Appropriate Authority, you have rights to disclose further under the NZ Whistleblowers Act, to either a different Appropriate Authority, a Minister or the Ombudsman in New Zealand.

Treatment of employees who are the subject of a Protected Report

Howden will take all reasonable steps to ensure that any individual who is the subject of a Protected Report is afforded fair treatment by ensuring that every individual subject to the investigation is granted sufficient opportunity to reply to allegations before any findings are made. Generally, when an investigation is conducted, employees who are the subject of a Protected Report may be, within the constraints of confidentiality:

- told about the substance of the allegations;
- given a fair and reasonable opportunity to respond to the allegations before the investigation is finalised; and
- informed about the findings of the investigation and given an opportunity to respond to those conclusions before any action is taken against them (subject to legal, privacy and confidentiality requirements).

Before providing any information to an employee who is the subject of a Protected Report, Howden will:

- make sure the information does not include the Eligible Whistleblower's or Discloser's identity;
- make sure we have taken all reasonable steps to reduce the risk that the Eligible Whistleblower/ Discloser will be identified from the information; and
- only provide information that is reasonably necessary for investigating the issues raised in the Protected Report.

6. Anonymity, Confidentiality and Protections

Anonymous reports

Reports made to the Safecall service are anonymous and can be made via the independent hotline managed by appropriately qualified call handlers. Calls are not recorded with only handwritten notes used to generate a comprehensive written report to the Regional General Counsel of Howden.

Reports made to the Human Resources team at Howden are also recorded anonymously and filed in restricted access folders viewable only by senior Human Resources representatives. All records remain strictly confidential unless specific consent from the individual making the report has been obtained.

The individual reporting the case (i.e. the “Eligible Whistleblower”) must keep details of any investigation confidential whilst the investigation is ongoing.

Protection of your identity

If you make a Protected Report, it is illegal for a person to disclose your identity or any information that is likely to lead to identification of your identity unless:

- you provide your consent to the disclosure;
- ASIC, APRA, the ATO or the Australian Federal Police require disclosure to a government authority, court or tribunal to help that authority perform their functions or duties;
- In New Zealand, if there are reasonable grounds to believe that the release of your identity/identifying information is essential for the effective investigation of the disclosure; or to prevent serious risk to public or individual health or safety or the environment; or to comply with natural justice; or to an investigation by a law enforcement or regulatory agency for the purposes of law enforcement;
- the disclosure is to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower protections in the Corporations Act); or
- the disclosure is required by law.

If you choose not to disclose your identity, we will respect your decision and Howden will:

- ensure your personal information or references to your identity is redacted in all relevant documentation;
- refer to you in gender-neutral terms;
- ensure access to your Protected Report and all materials relevant to your Protected Report are held securely and only accessible by individuals involved in investigating your Protected Report or where applicable, are providing you with support; and
- take reasonable steps to ensure our personnel understand the requirements of this policy.

Protection from detrimental acts or omissions

Howden is committed to protecting the rights of those who make Protected Reports and will not tolerate any detriment or threats of detriment against a whistleblower, suspected whistleblowers or anyone who participates in an investigation.

Protection from personal detriment is available to any Eligible Whistleblower or Discloser who makes a Protected Report or where an individual has not made a Protected Report but is suspected to have made a Protected Report.

Detriment includes dismissal, changes to your employment, position, or duties to your disadvantage, discrimination, harassment or intimidation, harm, or injury (including psychological harm), damage to property, reputation, business or financial position or any other damage.

The following actions are not considered to be detrimental conduct:

- reasonable administration action taken to protect a whistleblower from detriment (e.g. moving a discloser to another office to prevent victimisation); and
- managing unsatisfactory work performance of a whistleblower, in line with Howden's usual performance management framework.

If you make a Protected Report, Howden will protect you from detriment arising from the making of the Protected Report by:

- completing a risk assessment to determine the risk of detriment against you and any other individual(s);
- making available support services such as Howden's independent Employee Assistance Program (being the external third-party work-based intervention program). Information pertaining to the Employee Assistance Program can be found on HowdenHub;
- if applicable, making reasonable adjustments for you in order to enable you to perform your duties at work without exposing you to detriment (e.g. by moving you to another location); and
- implementing strategies to help you to minimise and manage stress, time or performance impacts or other challenges resulting from the disclosure or its investigation.

Compensation and other remedies

It is an offence to victimize and/or cause or threaten to cause, detriment to a person (and to their family, in New Zealand) because they or someone else has made, may have made, proposes to make, or could make a Protected Report. Serious penalties apply to both individuals and corporations. A person who is subject to such detriment may also seek compensation or other remedies from a court if they suffer loss, damage, or injury because of a Protected Report or because Howden failed to take reasonable precautions and exercise due diligence to prevent detriment.

If you believe you have suffered detriment as described under this policy, you are encouraged to obtain independent legal advice in relation to your rights. You can make a complaint to any one of the Eligible Recipients and lodge a complaint with ASIC, APRA or the ATO in Australia, or go to an Appropriate Authority, escalate to a Minister or to seek support with the Ombudsman in New Zealand. You will not be retaliated against in relation to your Protected Report (such as by way of dismissal, harassment, discrimination, or any actions that may cause detriment towards you) by Howden.

Civil, criminal, and administrative liability protection

You can still qualify for protection if the information in your Protected Report turns out to be incorrect and/or you were mistaken. Such protections include protections from:

- civil liability (e.g. any legal action against you for breaching an employment contract, a duty of confidentiality or another contractual obligation);

- criminal liability (e.g. legal action against you for unlawfully releasing information, or other use of the Protected Report against you in a criminal proceeding (other than for making a false disclosure)); and
- administrative liability (e.g. disciplinary action for making the Protected Report).

However, the protections do not prevent action from being taken against you for any misconduct that you are involved in that is revealed in your Protected Report.

7. Non-Compliance with the Policy

Any non-compliance with this policy such as failing to maintain confidentiality of an individual who has made a whistleblower report, preventing the investigation of a whistleblower report or victimizing and/or retaliating against a person who has made a whistleblower report will be investigated. In New Zealand, the law also prohibits people from victimizing the Discloser's family (and if that occurred, Howden would also investigate promptly). Non-compliance with this policy will be treated as a serious matter and may be the subject of disciplinary action up to and including dismissal or termination of engagement with Howden. Breaches of confidentiality are also an offence under the Corporations Act in Australia and serious penalties apply for both individuals and corporations.