



Rabobank

Rabobank Australia Local Policy **Whistleblowing**

Version 7.0
Effective 14 August 2026



1. About this policy

1.1. Context

Rabobank is committed to maintaining a high standard of business ethics and safety within its organisation. Rabobank promotes a strong culture of transparency and integrity and is committed to detecting and addressing misconduct and ensuring that those who become aware of misconduct can report it without being concerned that it will negatively affect them.

To the extent that there are any inconsistencies between other internal global or local policies and the Local Policy on Whistleblowing – Australia (“this Policy”), this Policy takes priority in relation to Rabobank. Where there is any conflict between local legislation, regulation or common law and this Policy, the more stringent provision will always apply.

Information and learning about this Policy and associated procedures is also made available to relevant persons through training sessions conducted periodically.

A copy of this Policy is accessible to all employees and officers of Rabobank via the [Policy House Portal](#) and to Board members on Diligent Boards. It is also available on [Rabobank's website](#).

1.2. Objectives

The objective of this Policy is to provide an individual a safe place to report confidentially on a Suspicion of Reportable Conduct, without fear of victimisation, retaliation or detriment. This provides Rabobank the opportunity to address possible wrongdoings.

The Policy sets out:

- how individuals can report misconduct to the various speak up channels or other individuals referred to in this Policy as Eligible Recipients;
- how Rabobank will assess whether such reports are Whistleblower Disclosures;
- how Whistleblower Disclosures are managed and how reports made to speak up channels that are not assessed as Whistleblower Disclosures are managed; and
- where a report is assessed as a Whistleblower Disclosure, the support and protection available to the Whistleblower.

1.3. Who should use this policy?

Entities	■ Rabo Australia Limited (and its subsidiaries) ■ Coöperatieve Rabobank UA Australia Branch ■ Rabobank Australia Limited
Scope	This Policy applies to Coöperatieve Rabobank U.A. Australia Branch (RBAB), Rabobank Australia Limited (RBAL) and Rabo Australia Limited (RAL) and any related bodies corporate collectively referred to as "Rabobank " or "Rabobank Australia".

	This Policy applies to any natural person who works, or has worked, at Rabobank, as well as any natural person who has, or has had, a business relationship with Rabobank (e.g. business partners, consultants, suppliers or service providers) or one of their employees or subcontractors. This Policy also applies to a relative, spouse or dependant of any of the above categories (or a dependant of their spouse). This Policy does not apply to customers. This Policy is aligned with the Global Policy on Whistleblowing which includes RANZ exceptions. In case a Report regards Senior Management from the Region Australia, New Zealand (RANZ) of Wholesale and Rural, this Report will be handled by the Local Decision Maker as described in the Global Procedure on Whistleblowing. This Policy does not form a contract or part of Rabobank's contracts of employment/engagement with its employees, volunteers or contractors, or otherwise create any enforceable rights in their favour. Rabobank may vary the contents of this Policy from time to time or replace this Policy in certain circumstances, in its absolute discretion. To the extent this Policy requires employees, volunteers or contractors to act or not act in a certain way, this Policy forms a direction of Rabobank with which they must comply. Employees, volunteers and contractors may face disciplinary action if they do not comply with this Policy, including if they engage in any of the conduct that is prohibited by this Policy, up to and including termination of employment or engagement.
Key policy	Yes

2. Policy requirements

2.1. Advice on whistleblowing & making a report

Rabobank encourages employees to discuss any concerns about Rabobank's activities and processes or suspicions they have with their management. However, if this is not appropriate or suitable, employees are encouraged to report any concerns they have via the various Speak Up channels outlined in this Policy. To the greatest extent possible, we will treat all such disclosures as confidential.

An individual looking for a listening ear, guidance or advice (all of which are confidential) on this Policy and whether their disclosure may be a Whistleblower Disclosure can turn to:

- Whistleblowing Representative; or
- External trusted person at KPMG Australia [Contact-external-trusted-persons-and-hotlines.docx](#).

Reports that constitute formal Whistleblower Disclosures (as described below and subject to applicable legislation) receive additional protection. These are described below.

2.1.1. What reports will be assessed as Whistleblower Disclosures?

Requirements

- R1.** A report will be assessed as a Whistleblower Disclosure, and will be treated by Rabobank as a whistleblower matter in accordance with this Policy, if the report is made:
- by an Eligible Person (see 2.1.3 below);
 - to an Eligible Recipient (see 2.1.4 below); and
 - about Reportable Conduct (see below).
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- R2.** Reportable Conduct is conduct in relation to Rabobank that the reporter has reasonable grounds to suspect is (including potential) misconduct or an improper state of affairs, such as:
- fraud, including but not limited to theft, expenses fraud, conflicts of interest, corruption, manipulation of financial statements & non-financial reporting, concealing fraud or other illegal activities (such as falsifying loan applications, money laundering, offering/accepting a bribe or misappropriation of funds);
 - anti-trust or anti competition breach;
 - a negligent act, a breach of trust, a breach of duty;
 - a systemic issue (such as a business practice or behaviour that may cause harm to customers);
 - indicates a significant risk to public safety or the stability of (or confidence in) the financial system;
 - serious criminal offences including modern slavery and human trafficking;
 - breaches of other internal policies and guidelines, including the Rabobank Compass which are material, or systemic or egregious in nature, or malicious intent or wilful negligence;
 - constitutes an offence against or a contravention of any of the below laws (or any instrument made under them):
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- Corporations Act 2001 and Regulations;
- Australian Securities and Investments Commission Act 2001;
- Banking Act 1959;
- Financial Accountability Regime Act 2023;
- Financial Sector (Collection of Data) Act 2001;
- Insurance Act 1973;
- Life Insurance Act 1995;
- National Consumer Credit Protection Act 2009; or
- Superannuation Industry (Supervision) Act 1993;
- constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- constitutes conduct aimed to conceal records or other evidence related to any of the above.

R3. Rabobank encourages all current and former employees, officers, contractors, intermediaries and agents to raise Reportable Conduct to one of the speak up channels or other individuals referred to in this Policy as 'Eligible Recipients', without fear of retaliation.

R4. A Whistleblower will be protected in accordance with the protections set out in this Policy even if the Whistleblower Disclosure turns out to be incorrect.

2.1.2. What reports will not be treated as a Whistleblower Disclosure?

Requirements

R5. Rabobank also encourages employees to consider if they would prefer to discuss their concerns with their line manager, manager of the manager, the relevant risk champion or Compliance. However, employees should be aware that raising concerns through these channels may not constitute a disclosure under the Whistleblower Policy and, as a result, whistleblower protections under Australian law may not apply.

R6. Personal work-related grievances are generally not considered Reportable Conduct and will not be treated as a Whistleblower Disclosure under this Policy. Personal work-related grievances are generally grievances about any matter in relation to the reporter's employment (or former employment), having implications for the reporter personally including:

- interpersonal conflict between employees;
- a staff member's dissatisfaction with their pay (unless the staff member's grievance relates to discriminatory conduct in some respect);
- a staff member's dissatisfaction with their performance feedback or results of their annual performance review (unless the staff member's grievance relates to discriminatory conduct in some respect); or
- a staff member's failure to receive a promotion on grounds unrelated to discriminatory conduct.

R7. A personal work-related grievance may amount to Reportable Conduct and still qualify for protection if:

- it includes information about misconduct in relation to Rabobank;
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- Rabobank has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the report relates to information that suggests misconduct beyond the reporter's personal circumstances;
 - the staff member suffers from or is threatened with detriment for making a report; or
 - the staff member seeks legal advice or legal representation in relation to the operation of the whistleblower protections under the Whistleblower Legislation
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2.1.3. Who can make a Whistleblower Disclosure - Eligible Person

Requirements

- R8.** For a report to be a Whistleblower Disclosure, it must be made by an Eligible Person (together with the additional requirements that are set out at 2.1.1 above). A person is an Eligible Person (including in relation to Tax Disclosures) if they are a natural person and are, or have been:
- an officer of Rabobank (this includes directors of the board and the company secretary of Rabobank);
 - an employee of Rabobank;
 - an individual who supplies services or goods to Rabobank (whether paid or unpaid);
 - an employee of a supplier of services or goods to Rabobank (whether paid or unpaid);
 - an individual who is an associate of Rabobank (this includes directors and secretaries of both Rabobank and any related bodies corporate); or
 - a relative, spouse or dependant of any of the above (or a dependant of their spouse).
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2.1.4. Who must a report be made to - Eligible Recipients

Requirements

- R9.** For a report to be assessed as a Whistleblower Disclosure, it must be made by an Eligible Person to an Eligible Recipient as set out in this section 2.1.4 (together with the additional requirements that are set out at 2.1.1 above).
- R10.** Reporters are encouraged to use the speak up channels below to raise Reportable Conduct. Reports can be made anonymously or with the reporter's identity at any time (24 hours/7 days) to the:
- **Online platform** <https://rabobank.speakup.report/speakup>; or
 - **Hotline** - This can be accessed via the phone number +61 2 8284 6262 (enter access code 126739).
- R11.** When a report is made in a face-to-face meeting or by phone or speech-system, this Report is registered by:
- recording the conversation in a permanent and retrievable form, with prior consent of the Reporter; or
 - drafting a complete and accurate written account of the conversation, while the Reporter is given the opportunity to check, correct and show agreement by confirming the drafted account of the conversation.
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- In case the Reporter provides insufficient information, it might not be possible for the Eligible Recipient to follow up on the report.

R12. Whistleblower Disclosures may also be made to the following additional Eligible Recipients:

- a Senior Leader;
- the Whistleblowing Representative - by telephone, by email, in writing or in a face-to-face conversation upon request within a reasonable period of time;
- an officer, including a director or company secretary, of Rabobank's board of directors;
- an internal auditor (including any member of an audit team conducting an audit of Rabobank) or external auditor of Rabobank;
- an actuary of Rabobank;
- any other person authorised by Rabobank to receive Whistleblower Disclosures; or
- email to whistleblowing@rabobank.nl.

R13. Where the information to be reported relates to the tax affairs of Rabobank or an associate of Rabobank (a Tax Disclosure), reporters are still encouraged to make a report via the methods set out above. Reporters can also make Tax Disclosures to the following additional Eligible Recipients:

- a registered tax agent or Business Activity Statement (BAS) agent who provides tax agent services or BAS services to Rabobank;
- the Tax Practitioners Board; or
- any other employee or officer (within the meaning of the Corporations Act 2001) of Rabobank who has functions or duties that relate to the tax affairs of Rabobank.

Purpose	So that all persons covered by this Policy understand who to contact with Reportable Conduct.
Related documents	Receiving a Whistleblowing Disclosure - Australia Global Procedure on Whistleblowing

2.1.5. Anonymous reports and Whistleblower Protections

Requirements	R14. Reporters can make an anonymous report and still be entitled to the whistleblower protections set out in this Policy if the report is assessed as a Whistleblower Disclosure. If a reporter wants to maintain complete anonymity when making a report, Rabobank suggests that the reporter submits their report on an anonymous basis via the methods outlined above in section 2.1.3, or if a report is being made to any other Eligible Recipient listed above, that they refrain from telling others that they have made a report. R15. A reporter can choose to remain anonymous after making a report over the course of the investigation and after the investigation is finalised and will still qualify for whistleblower protection under this Policy if the report is assessed as a Whistleblower Disclosure. A reporter can also refuse to answer questions throughout the process that may reveal their identity. A reporter who wishes to remain anonymous is encouraged to maintain ongoing two-way communication
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with Rabobank, so that Rabobank can ask follow-up questions or provide feedback.

R16. If a reporter provides their identity when reporting their concerns, and the report is assessed as a Whistleblower Disclosure, the person receiving the report is not permitted to reveal the identity of the Whistleblower, or information that is likely to lead to the identification of the Whistleblower, except in certain circumstances as set out in section 2.4.1 below. This is a key protection provided to Whistleblowers under this Policy (see also section 2.4 below).

R17. If a Whistleblower Disclosure is made, and the Whistleblower's identity is not provided, this may:

- prevent Rabobank from contacting the Whistleblower to clarify or confirm information supplied (if the report is not submitted through the speak up online platform or hotline);
 - impact Rabobank's ability to proceed with an investigation (e.g. if there are gaps in information supplied that cannot be clarified directly in confidence with a Whistleblower);
 - prevent Rabobank from updating the Whistleblower on Rabobank's efforts taken in response to their Whistleblower Disclosure, where appropriate; and
 - affect Rabobank's ability to take steps to protect the Whistleblower from detriment.
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2.1.6. Whistleblower Disclosures made outside of Rabobank

Public Interest Disclosures and Emergency Disclosures, Reporting to Regulators and Legal Practitioners

Requirements

R18. There are two categories of disclosure that can be made outside of Rabobank (to a journalist or a Member of Parliament) and still obtain the protections of the Whistleblower Legislation. These are called 'Public Interest Disclosures' and 'Emergency Disclosures' and are defined in the Appendix. Making reports to others outside of Rabobank (other than as set out in this Policy) will not obtain the protection of the Whistleblower Legislation or any other protections provided by this Policy.

R19. Unless a report is being made under the above provisions, speaking to a journalist or a Member of Parliament about confidential information in relation to Rabobank without authorisation is not permitted and may lead to disciplinary action.

R20. Whistleblower Disclosures can also be made to the following regulators and still obtain whistleblower protection under the Whistleblower Legislation:

- the Australian Securities and Investment Commission (ASIC);
- the Australian Prudential Regulation Authority (APRA);
- the Commissioner of Taxation (ATO) (in relation to Tax Disclosures); or
- any other prescribed Commonwealth authority or regulator.

However, if a report is made to one of these regulators, Rabobank may not automatically become aware of it and may not be able to respond to it in accordance with this Policy.

R21. Reports can be made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions. Such reports are also protected.

2.2. Handling of reports

2.2.1. Follow up of a report and Investigation of Whistleblower Disclosures

Requirements

R22. A reporter will receive confirmation of receipt of the report from the Whistleblowing Representative within seven days of the date on which the report is received.

Subject to the Whistleblowing Representative receiving the necessary consent in writing from the reporter (as set out in Annex III of the Global Procedure on Whistleblowing), the Whistleblowing Representative registers the full report in the appropriate register in an anonymized way and keeps this register updated on developments regarding the report.

If such consent is not provided, a high-level anonymised summary of the report will be recorded in the appropriate register, and the Whistleblowing Representative keeps this register updated on developments regarding the Report.

The Global Whistleblowing Committee will be informed without undue delay of all reports under this Policy, as well as the developments regarding these reports with the objective of having global oversight of all reports made.

If a report is assessed as a Whistleblower Disclosure, subject to Section 2.9, a decision will be made by the Group Executive Chief Risk Officer RANZ regarding whether the concerns raised should be investigated. There may be times that a decision is made not to investigate a Whistleblower Disclosure or part of it – for example, if the matters have already been investigated and there is no new information.

R23. If a decision is made to investigate a Whistleblower Disclosure, it may be necessary for Rabobank to:

- obtain specialist, independent advice on areas outside the organisation's knowledge or expertise, including trained investigation staff from either inside Rabobank locally or globally, or refer the matter to a third-party investigation firm, having regard to the nature of the Whistleblower Disclosure;
- appoint a person to assist in the investigation of Whistleblower Disclosure; and/or
- refer the matter to the police or law enforcement where Whistleblower Disclosures relate to criminal behaviour.

R24. If a report is not assessed as a Whistleblower Disclosure, the report may be referred to the most appropriate area of Rabobank for management (for example, personal work-related grievances will generally be referred to HR; customer complaints will be referred to the relevant customer resolutions team).

R25. Subject to Section 2.4, Rabobank may conduct a whistleblowing investigation it deems appropriate or necessary. This may include but is not limited to:

- Speak to anyone who may be affected or involved in the Whistleblower Disclosure so that they are provided with the opportunity to respond to the allegation(s);
- consider these responses; and
- speak to witnesses.

R26. Subject to all legal and organisational requirements and any wellbeing considerations, Rabobank may consider the working arrangements of affected persons including but not limited to any need for a paid leave of absence.

R27. Rabobank is not obliged to reopen an investigation and may conclude that the investigation was conducted properly, or that new information is either not available or would not change the findings of the investigation.

Purpose

To confirm that all Whistleblower Disclosures will be reviewed and, where appropriate, investigated at the earliest opportunity. Any findings will be managed promptly. The way a Whistleblower Disclosure is managed depends on what it involves and will be dealt with on a case-by-case basis in accordance with this Policy.

Related documents

[Global Procedure on Whistleblowing](#)

2.2.2. Personal interests of Whistleblowers

Requirements

R28. A Whistleblower is encouraged to reveal, at the outset, any personal interest or involvement they may have in the Whistleblower Disclosure. A failure to disclose any personal interests will not prevent a Whistleblower Disclosure from being investigated pursuant to this Policy.

2.2.3. Fair treatment of employees that are the subject of a Whistleblower Disclosure

Requirements

R29. Fair treatment of those persons implicated in a Whistleblower Disclosure includes but is not limited to the following:

- the opportunity to be 'heard' and respond to the allegations against them before any adverse findings are made; and
 - the opportunity to have their responses considered by Rabobank and, in appropriate circumstances, investigated.
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R30. During any investigation into a Whistleblower Disclosure, Rabobank extends support to employees, officers and others engaged by Rabobank and implicated in the Whistleblower Disclosure throughout the investigation process. Any suspected adverse or detrimental treatment in this regard should be reported as soon as possible via the methods set out in section 2.1.4 so that these matters may be addressed.

R31. Rabobank will endeavour to respond promptly to any concerns raised by parties who are the subject of a Whistleblower Disclosure where such party has concerns about unfair treatment in the context of the assessment of, and investigation into, the Whistleblower Disclosure.

Purpose

To confirm that Rabobank is committed to ensuring the fair treatment of employees and other persons engaged by Rabobank who are mentioned in Whistleblower Disclosures, or to whom such disclosures relate.

2.2.4. Providing updates to Whistleblowers

Requirements

R32. Rabobank will keep the Whistleblower informed of the progress and/or outcome of the investigation, subject to the considerations of privacy of the individuals against whom the allegations have been made, and if the 'Whistleblower' can be contacted. Any updates supplied to a Whistleblower may need to be limited where appropriate, for reasons including to preserve the confidentiality of an investigation and the privacy of those potentially affiliated, named, implicated or associated with the Whistleblower Disclosure. The frequency and detail of any updates supplied (where appropriate), and the initiation or conclusion of any investigation, may vary according to the nature of the Whistleblower Disclosure. Where appropriate and subject to applicable legal, confidentiality and regulatory constraints, the Whistleblowing Representative will use reasonable endeavours to provide the reporter with general and high-level information about the assessment of the report and, to the extent applicable, its progress or outcome. Any such information may be provided within a reasonable timeframe, ideally within three months of acknowledgment of receipt of the report. Feedback will be provided only where lawful and appropriate, and will not include information that could compromise confidentiality, legal privilege, procedural fairness, or regulatory obligations.

R33. Where a Whistleblower Disclosure cannot be substantiated, Rabobank may close the matter and notify the Whistleblower accordingly.

2.2.5. Whistleblower involvement after a Whistleblower Disclosure

Requirements

R34. Any Whistleblower who reveals their identity may be asked to participate in confidential interview(s) in relation to their Whistleblower Disclosure to clarify information supplied, or provide further information, in order for Rabobank to proceed with an investigation (where appropriate).

R35. No adverse consequences, including retaliation, will result for a Whistleblower where a Whistleblowing Disclosure is made on reasonable grounds and the information provided was believed to be correct at the time of reporting, even if the disclosure cannot ultimately be substantiated.

If a Whistleblower believes they are being adversely treated or have been subject to any detriment they should report their concerns as soon as possible via the methods set out in section 2.1.4 so that these matters may be addressed.

2.2.6. Proven misconduct

Requirements

R36. Rabobank may commence performance management or take disciplinary action, up to and including termination of employment or engagement, in relation to those found to have engaged in misconduct.

R37. Rabobank may also refer matters to law enforcement or regulatory bodies at any time should the misconduct in Rabobank's reasonable opinion warrant such a referral.

Purpose	To clarify the actions that Rabobank may take in relation to misconduct.
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Related documents	Local Standard on Disciplinary Action - Australia
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2.3. False reports

2.3.1. Consequences for knowingly making a false Whistleblower Disclosure

Requirements	R38. Whistleblowers must have reasonable grounds for the concerns raised. Knowingly making a false allegation will be considered a serious matter, a breach of Rabobank's Code of Conduct and be subject to disciplinary proceedings up to and including termination of employment or engagement.
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2.4. Protection and support of Whistleblowers

2.4.1. Protecting confidentiality

Requirements	R39. The identity of a Whistleblower (or any information that would be likely to lead to identifying a Whistleblower) is required to be kept strictly confidential, except in the circumstances set out below.
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R40. A Whistleblower's identity may be disclosed by Rabobank to ASIC, APRA or the Australian Federal Police. It is also permissible for Rabobank to disclose:

- information regarding the suspected or actual wrongdoing disclosed, without revealing the Whistleblower's identity or information that is likely to lead to the identification of the Whistleblower;
 - information, other than the Whistleblower's identity, if it is reasonably necessary for the purposes of the investigation and all reasonable steps have been taken to reduce the risk that the Whistleblower will be identified;
 - the identity of a Whistleblower, or information likely to lead to their identification, to a legal practitioner for the purposes of obtaining legal advice or representation regarding the operation of the Whistleblower Legislation; or
 - the identity of a Whistleblower where the Whistleblower has provided consent.
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R41. To allow a proper investigation of the matter, and provide appropriate support to the Whistleblower, Rabobank may ask a Whistleblower to consent to the disclosure of their identity to specific individuals or relevant teams, such as:

- the Rabobank Global Whistleblowing Committee;
 - the Global Whistleblowing Representatives;
 - the Rabobank Internal & Regulatory Investigations team (IRI) team globally; and
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- any other persons reasonably necessary for the purposes of conducting a whistleblower investigation.

R42. Any information disclosed in breach of this Policy will be treated seriously and may result in disciplinary action up to and including termination of employment or engagement. A breach of this Policy may in certain circumstances also result in civil and/or criminal prosecutions.

2.4.2. General protections for Whistleblowers

Requirements

R43. Rabobank will not tolerate any detriment caused, or threatened to be caused, against any person who has made or who is believed to have made a Whistleblower Disclosure, or who has assisted with an investigation into a Whistleblower Disclosure, because they made such a Disclosure or provided such assistance. Detriment may include any of the following:

- Dismissing the employee;
- injuring the employee in their employment, (e.g. not giving an employee legal entitlements such as pay or leave);
- changing an employee's job to their disadvantage;
- offering a potential employee different (and unfair) terms and conditions for the job, compared to other employees;
- discriminating between employees to the disadvantage of a Whistleblower;
- victimisation, harassment or intimidation of a person;
- harm or injury to a person, including psychological harm;
- not hiring someone because they have been a Whistleblower;
- damage to a person's property, reputation, business or financial position; or
- any other damage to a person.

R44. Any victimisation, retaliation or detriment caused or threatened to be caused in reprisal for a Whistleblower Disclosure will be treated as misconduct and will result in disciplinary action up to and including termination of employment or engagement.

2.4.3. Support for Whistleblowers

Requirements

R45. To support Whistleblowers Rabobank encourages Whistleblowers to make use of Rabobank's Employee Assistance Program (EAP). Details of the EAP and EAP provider can be found on the Rabobank intranet at [Employee Assistance Program](#)

R46. A Whistleblower (or any other employee or person) can seek compensation and other remedies through the courts if:

- they suffer loss, damage or injury because of a disclosure; and
- Rabobank failed to prevent a person from causing the detriment.

Purpose

To set out the protections for Whistleblowers under this Policy and encourage individuals to raise concerns arising out of a Whistleblower Disclosure (or anticipated Whistleblower Disclosure) or any subsequent investigation process via the methods set out in section 2.1.4 so that these matters may be addressed. A Whistleblower can

also raise concerns regarding any breach of confidentiality with a regulator such as ASIC, APRA or the ATO for investigation.

2.4.4. Criminal or Civil Liability

Requirements	R47. A Whistleblower will be protected from civil, criminal and administrative liability for making the Whistleblower Disclosure. However, the Whistleblower is not protected from civil or criminal liability for any of their conduct which may be revealed by the Whistleblower Disclosure.
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2.5. Compliance with this policy

Requirements	R48. Breaches or suspected breaches of this Policy should be reported via the methods set out in section 2.1.4. A breach of this Policy may result in disciplinary action up to and including termination of employment or engagement. As indicated above, a Whistleblower can also raise a concern about any breach of confidentiality with a regulator such as ASIC, APRA or the ATO for investigation.
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2.6. Monitoring and testing

Requirements	R49. With an effective whistleblower program, Rabobank is able to demonstrate an environment where Whistleblowers can safely make Whistleblower Disclosures.
	R50. Given the sensitivities that apply to the whistleblower program and privacy requirements, and to enable consistent implementation of recommendations and controls, the monitoring and testing of the local whistleblower program also operates globally by the Global Compliance team as part of the global whistleblower program managed as part of the Global Compliance Framework.

2.7. Record Keeping

Requirements	R51. Information collected in relation to the requirements of this Policy must be treated in accordance with the Local Policy on Record Keeping and related standards.
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Related documents	Local Policy on Record Keeping and related standards
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2.8. Personal data

Requirements	R52. Personal data collected and stored in relation to the requirements of this Policy must be treated in accordance with the Local Policy on Privacy and related standards including the Global Procedure on Whistleblowing.
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Related documents	Local Policy on Privacy and related standards Global Procedure on Whistleblowing
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2.9. Conflicts of Interest

Requirements

R53. In the event of any real or perceived conflict of interest arising, including if a report is made about the Risk/Chief Risk Officer (CRO) domain, reports will be managed in accordance with applicable legal and regulatory requirements, with a focus on independence, confidentiality and procedural fairness. Such matters will be assessed and, where necessary, investigated by suitably qualified personnel with no actual or perceived conflict of interest, supported by independent oversight outside of the CRO domain to ensure objectivity and fairness of outcomes.

Appropriate escalation and governance oversight will be applied, including to senior management or the Board where required.

Rabobank is committed to protecting individuals who report concerns in good faith from detriment, while ensuring timely remediation and the ongoing strengthening of risk management, compliance and governance frameworks.

Related documents

[Local Policy on Treating Clients Fairly, Competition, Market Abuse and Conflicts of Interest](#)

[Regional Standard on Conflicts of Interest](#)

Appendix 1: Background

A1.1. Laws and regulations

Under Australian legislation there are specific provisions which provide whistleblowers with legal rights (including protections) in relation to certain types of disclosures. For Rabobank, the relevant legislation, collectively referred to as “Whistleblower Legislation”, is as follows:

Name	
Legislation	Sections 1317AA to 1317AJ of the <i>Corporations Act 2001</i>
	Sections 14ZZT to 14ZZE of the <i>Taxation Administration Act 1953</i>
Regulations and guidelines	<i>Corporations Regulations 2001</i>
	ASIC Regulatory Guide 270: Whistleblower Policies
	ASIC Immunity Policy

The protections under the Whistleblowing Legislation only apply to certain types of disclosures (“Qualifying Disclosures”). See definitions in Appendix 2 for additional information.

While this Policy contains a summary of parts of the Whistleblowing Legislation, for further detail, refer to the text of this legislation. This Policy is not intended to override any rights or obligations under the Whistleblowing Legislation.

A1.2. Related policies and standards

Name	
Global policy	Global Policy on Whistleblowing
Local policies and standards and other relevant documents	Rabobank Code of Conduct
	Local Policy on Harassment, Bullying and Discrimination – Australia
	Local Standard on Harassment, Bullying and Discrimination – Australia
	Local Standard on Reporting Unacceptable Behaviour
	Local Standard on Disciplinary Action – Australia
	Local Policy on Treating Clients Fairly, Competition, Market Abuse and Conflicts of Interest
	Regional Standard on Conflicts of Interest
	Local Policy on Privacy and related standards
	Local Policy on Record Keeping and related standards
	Consequence Management Framework – Australia
	Global Procedure on Whistleblowing

Appendix 2: Definitions

Term	Definition
Eligible Person	An individual referred to in 2.1.3 of this Policy who is able to make a Whistleblower Disclosure.
Eligible Recipient	A person or speak up channel referred to in 2.1.4 of this Policy and designated in this Policy as an avenue through which a report can be made to qualify for whistleblower protection under this Policy.
Emergency Disclosure	Disclosure made to a journalist or a Parliamentarian, which is eligible for protection if: - the whistleblower has previously made a disclosure to ASIC, APRA or any other prescribed Commonwealth authority; - the whistleblower 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; and - the whistleblower gives the body to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that the whistleblower intends to make an emergency disclosure. For Emergency Disclosures the extent of the information disclosed must be no greater than is necessary to appropriately inform the recipient of the relevant misconduct or substantial imminent danger.
Public Interest Disclosure	Disclosure made to a journalist or a Parliamentarian, which is eligible for protection if: - the whistleblower has previously made a disclosure to ASIC, APRA or any other prescribed Commonwealth authority; - at least 90 days have passed since the disclosure was made to ASIC, APRA or any other prescribed Commonwealth authority; - the whistleblower does not have reasonable grounds to believe that action is being taken to address the matters to which the previous disclosure related; - the whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest; and - following the end of the 90 day period, the whistleblower gives the body to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that the whistleblower intends to make a public interest disclosure.
Qualifying disclosure	A matter disclosed by a Whistleblower to an Eligible Recipient where the Whistleblower has reasonable grounds to suspect: - misconduct (which includes fraud, negligence, default, breach of trust and breach of duty); or - an improper state of affairs in relation to Rabobank or any related body corporate of Rabobank. Including: - an offence against or a contravention of:

Term	Definition
	1. the Corporations Act 2001 (and Regulations); 2. the Australian Securities and Investments Commission Act 2001; 3. the Banking Act 1959; 4. the Financial Accountability Regime Act 2023; 5. the Financial Sector (Collection of Data) Act 2001; 6. the Insurance Act 1973; 7. the Life Insurance Act 1995; 8. the National Consumer Credit Protection Act 2009; 9. the Superannuation Industry (Supervision) Act 1993; 10. an instrument made under any of the above Acts; ■ an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. This would include conduct such as bribery of a Commonwealth Public Official; ■ conduct that represents a danger to the public or the financial system; or ■ misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Rabobank or an associate of Rabobank.
Reportable Conduct	Any conduct in relation to Rabobank as set out in 2.1.1 of this Policy.
Senior Leader	The Chief Executive Officer and any Group Executive of Rabobank.
Suspicion	Suspicion means a belief held by an Eligible Person that is based on reasonable grounds, arising from information obtained: ■ in the course of their employment or engagement with Rabobank; or ■ through work-related dealings with Rabobank while engaged by another organisation.
Whistleblower	An Eligible Person who makes a disclosure of Reportable Conduct to an Eligible Recipient in accordance with this Policy.
Whistleblower Committee	A global committee that (among other responsibilities) has oversight of whistleblower matters globally, comprising the global Chief Compliance Officer, the global General Counsel, a senior HR manager and a senior manager representative of the business.
Whistleblower Disclosure	A disclosure of concern made by a Whistleblower that is being treated by Rabobank as a disclosure made under this Policy.
Whistleblowing Representative	Head of Compliance Advisory AU & Whistleblowing RANZ