



Whistleblower Policy

(Australia)

1. PURPOSE
2. WHAT KIND OF COMPLAINT CAN BE MADE UNDER THIS POLICY?
3. WHISTLEBLOWER PROTECTIONS UNDER THE CORPORATIONS ACT
4. MAKING A COMPLAINT UNDER THIS POLICY
5. INVESTIGATION OF AN ALLEGATION OR REPORTABLE CONDUCT
6. DUTIES OF EMPLOYEES IN RELATION TO REPORTABLE CONDUCT
7. OTHER REFERENCES

1. PURPOSE

Chubb strives to reach the highest standards of conduct in its business dealings and is committed to honest and ethical behaviour, corporate compliance and proper corporate governance.

This Whistleblower Policy covers the reporting of any instance of suspected misconduct or any improper state of affairs or circumstances, involving Chubb's businesses or entities and provides protections (if applicable under legislation) so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or retaliation.

This Whistleblower Policy applies to Chubb Fire & Security Pty Ltd in Australia and its employees in Australia. This Policy also extends to cover third parties (any entities and individuals) who seek in good faith to make a report regarding matters of misconduct to the company.

This Policy is made available to employees and officers of the company via the Chubb intranet, and to other persons having business dealings with Chubb through its website.

2. WHAT KIND OF COMPLAINT CAN BE MADE UNDER THIS POLICY?

A complaint may be made under this Whistleblower Policy if you have reasonable grounds to suspect that a Chubb director, officer, employee, contractor, supplier, tenderer or other person who has business dealings with Chubb has engaged in conduct ("Reportable Conduct") which:

- is dishonest, fraudulent or corrupt, including bribery or other activity in breach of the Chubb Code of Ethics;
- is unlawful activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- is conduct that constitutes an offence against any Commonwealth law punishable by 12 months' imprisonment or more;
- is potentially damaging to Chubb, a Chubb employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of Chubb property or resources;
- amounts to an abuse of authority;

- may cause financial loss to Chubb or damage its reputation or be otherwise detrimental to Chubb interests;
- involves harassment, discrimination, victimisation or bullying, other than personal work-related grievances as defined in the *Corporations Act 2001* ("Corporations Act"); or
- involves any other kind of misconduct or an improper state of affairs or circumstances as defined in the Corporations Act.

If you have a personal work-related grievance, as defined in the Corporations Act, this Policy will not apply for the purpose of reporting that grievance. Examples of personal work-related grievances include – complaints in relation to workplace conflict between employees or with your manager. For such grievances, please refer to the Chubb Human Resources Policy: Maintaining an Equitable Workplace, or the Chubb Code of Ethics.

3. WHISTLEBLOWER PROTECTIONS UNDER THE CORPORATIONS ACT

A. Conditions that must be met in order to receive whistleblower protection

The Corporations Act gives special protection to disclosures made about any misconduct or improper state of affairs relating to Chubb if the following three conditions are satisfied:

(i) The whistleblower is or has been:

- a) an officer or employee of a Chubb company;
- b) an individual who supplies goods or services to a Chubb group company or an employee of a person who supplies goods or services to a Chubb group company;
- c) an individual who is an associate of a Chubb Group company; or
- d) a relative, dependent or dependent of the spouse of any individual referred to at (a) to (c) above;

(ii) The report is made to:

- a) a Protected Disclosure Officer as set out below;
- b) an officer or senior manager of the Chubb Fire & Security Pty Ltd;
- c) Chubb's external auditor (or a member of that audit team);
- d) ASIC;
- e) APRA; or
- f) 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;

(iii) The whistleblower has reasonable grounds to suspect that:

The information that is to be disclosed concerns misconduct or an improper state of affairs or circumstances in relation to Chubb or its subsidiaries. This may include a breach of legislation including the Corporations Act, an offence against the Commonwealth punishable by imprisonment for 12 months or more, or conduct that represents a danger to the public or financial system.

Examples of conduct which may amount to a breach of the Corporations Act include: insider trading, insolvent trading, breach of the continuous disclosure rules, failure to keep accurate financial records, falsification of accounts, failure of a director or other officer of the Group to act with the care and diligence that a reasonable person would exercise, or to act in good faith in the best interests of the corporation or failure of a director to give notice of any material personal interest in a matter relating to the affairs of the corporation.

B. What are the whistleblower protections?

If the above three conditions at (i) – (iii) are met, the whistleblower protections given under the Corporations Act are as follows:

1. The whistleblower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure;
2. No contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the whistleblower for making the report;
3. In some circumstances, the reported information is not admissible against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty;
4. 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;
5. A whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary; and
6. 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.

Chubb is committed to ensure confidentiality in respect of matters raised under this Whistleblower Policy and that those who make a report are treated fairly and do not suffer detriment.

(a) Protection against detrimental treatment

Detrimental treatment includes harassment, discrimination, disciplinary action, dismissal, demotion, bias, threats or other unfavourable treatment which is connected with making the report.

If you are subjected to detrimental treatment as a result of making a report under this Policy you should:

- Inform a Protected Disclosure Officer (these are listed below) immediately; or
- Report the matter in accordance with the below section 'Who do I Report a Disclosure to?'

(b) Protection of your identity and confidentiality

Subject to compliance with legal requirements, upon receiving a report under this Policy, Chubb will only share your identity as a whistleblower or information likely to reveal your identity if:

- you consent;
- the concern is reported to the Australian Securities and Investments Commission ("**ASIC**"), the Australian Prudential Regulation Authority ("**APRA**"), the Tax Commissioner or the Australian Federal Police ("**AFP**"); or
- the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If Chubb needs to investigate a report, it may disclose information that could lead to your identification being ascertained, but it will take reasonable steps to reduce this risk.

Any disclosures of your identity or information likely to reveal your identity will be made on a strictly confidential basis.

(c) Protection of files and records

All files and records created from an investigation will be retained securely.

Whistleblowers are assured that a release of information in breach of this Policy will be regarded as a serious matter and will be dealt with under Chubb's disciplinary procedures.

The *Taxation Administration Act 1953 (Cth)* ("**Taxation Administration Act**") also gives special protection to disclosures about breaches of any Australian tax law, provided certain conditions are met.

C. Confidentiality

When a report is made under this Policy, the identity of the whistleblower must be kept confidential unless one of the following exceptions applies:

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

4. MAKING A COMPLAINT UNDER THIS POLICY

Who do I report the complaint to?

For the purposes of this Whistleblower Policy, to ensure appropriate escalation and timely investigation, reports are to be made directly to a '**Protected Disclosure Officer**' and these contacts are listed below:

Director, Financial Controls & Compliance

Director, Human Resources

Director, Legal Affairs

Director, Finance

The matter can also be reported to an "officer" or "senior manager" of the company. This includes a director, or a senior manager in the company who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the company, or who has the capacity to affect significantly the company's financial standing.

How do I make the complaint?

Please set out your complaint in writing (where possible) to one of the above Protected Disclosure Officers. You can also email or send your complaint through one of the options outlined below.

By Email

Reports may be emailed to the **Protected Disclosure Email** inbox: -

au_whistleblower@chubbfs.com

By Post

Reports may also be mailed and marked to the attention of one of the **Protected Disclosure Officers** above, to c/- Chubb Fire & Security Pty Ltd, Unit 1a, 21-23 South Street, Rydalmere, NSW 2116.

5. INVESTIGATION OF AN ALLEGATION OF REPORTABLE CONDUCT

Chubb will investigate matters reported under this Policy as soon as practicable after the matter has been received. A Protected Disclosure Officer may, with your consent, appoint another person to assist in the investigation of a report. Where appropriate, Chubb will provide feedback to you regarding the investigation process, subject to considerations regarding the privacy of those against whom allegations are made or anyone participating in the investigation and any other legal requirements.

The particular investigation process and enquiries undertaken will be determined by the nature and substance of the reported conduct. If the report is not made anonymously, a Protected Disclosure Officer or investigator will contact you to discuss the investigation process as soon as practicable after receipt of the report.

Where a report regarding alleged conduct is submitted anonymously, Chubb will conduct the investigation and its enquiries based on the information provided to it by the anonymous provider.

6. DUTIES OF EMPLOYEES IN RELATION TO REPORTABLE CONDUCT

It is expected that Chubb employees who become aware of reportable conduct, or suspect, on reasonable grounds, potential cases of reportable conduct, will report such conduct under this Policy.

7. OTHER REFERENCES

Chubb Code of Ethics

APi Group Corporation Ethics Helpline <https://apigroup.ethicspoint.com>