

## AUSTRALIA WHISTLEBLOWER POLICY

Summary	This Policy seeks to provide information on the specific statutory whistleblower protection available under the Australian law, including: How an individual can make an Eligible Disclosure (i.e, a disclosure that qualifies for whistleblower protection); Responsibilities of an individual who makes a disclosure; Responsibilities of an individual who receives a disclosure; Whistleblower protection available.;		
Scope	This Policy applies to the following businesses and functions: · Citi legal entities within Australia ('Citi'), · the Citi Ethics Office, · an Eligible Disclosure made in relation to a foreign Citi Related Body Corporate, and · an Eligible Disclosure made to an Eligible Recipient of a foreign Citi Related Body Corporate. Note that potential applicable laws in the host country of an employee, or former employee will need to be considered where the individual is an expatriate or temporarily assigned to work in another country. For any cross-border matters, the Australia General Counsel, and General Counsels in all other relevant countries must be consulted confidentially. This Policy applies to Citigroup, Inc. and its consolidated subsidiaries, subject to local laws and regulations, including the following:		
Target Audience	All Citi Officers and employees, the Citi Ethics Office, and Eligible Recipients of a foreign Citi Related Body Corporate		
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# 1 OVERVIEW

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## 1.1 INTRODUCTION

- 1.1.1 This Policy seeks to provide information on the specific statutory whistleblower protection available under the Australian law, including:
- How an individual can make an Eligible Disclosure (i.e, a disclosure that qualifies for whistleblower protection);
  - Responsibilities of an individual who makes a disclosure;
  - Responsibilities of Eligible Recipients who receive a disclosure;
  - Whistleblower protection available;
  - How Citi investigate Eligible Disclosures;
  - Fair treatment and support of individuals who makes, or are mentioned in an Eligible Disclosure.

## 1.2 POLICY PRINCIPLES

- 1.2.1 An individual is eligible for whistleblower protection under Australian law if they make a disclosure that qualifies for protection. The aim of whistleblower protection is to safeguard individuals who disclose misconduct so that they can do so safely, securely, and with the comfort that they will be protected and supported.
- 1.2.2 This Policy seeks to provide information on the specific statutory whistleblower protection available under the Australian law, including:
- How an individual can make an Eligible Disclosure (i.e, a disclosure that qualifies for whistleblower protection);
  - Responsibilities of an individual who makes a disclosure;
  - Responsibilities of an individual who receives a disclosure;
  - Whistleblower protection available;
  - How Citi investigate Eligible Disclosures;
  - Fair treatment and support of individuals who makes, or are mentioned in an Eligible Disclosure.
- 1.2.3 Disclosures that do not qualify for protection under Australian law are not covered by this Policy.
- 1.2.4 Refer to the Citi Code of Conduct, the Employees Complaints Policy and the Escalation Policy for information about the general protection Citi provides to individuals irrespective of whether statutory whistleblower protection is applicable.

## 1.3 KEY REQUIREMENTS

- 1.3.1 This Policy addresses the requirements under Section 1317AI of the Corporations Act 2001 to have, and make available a prescribed whistleblower policy.

## 1.4 COVERED TIER 4 LAWS AND REGULATION

- 1.4.1 Publication ID/Name(s) – 154101 - Corporations Act - Whistleblower Protection
- 1.4.2 Citation(s) – Corporations Act 2001 Part 9.4AAA, RG 270, Taxation Administration Act 1953 Part IVD
- 1.4.3 Publication Summary - From 1 July 2019, the whistleblower protections in Part 9.4AAA the Corporations Act 2001 (Corporations Act) have been expanded to provide greater protections for whistleblowers who report misconduct about companies and company officers.

ASIC is responsible for enforcing the corporate sector whistleblower protection regime, including where a whistleblower may suffer detriment for alleging breaches of laws outside of ASIC's regulatory responsibilities.

The corporate sector whistleblower protection regime:

- a) Includes in the definition of whistleblower both current and former employees, officers, and contractors, as well as their spouses, dependents, and other relatives, and anonymous disclosures
- b) extends the protections to whistleblower reports that allege misconduct, an improper state of affairs or

circumstances, or breach of financial sector law and all Commonwealth offences punishable by imprisonment of 12 months or more, though a report solely about a personal work-related grievance is not covered by the protections

c) creates civil penalty provisions, and in addition to the existing criminal offences, for causing or threatening detriment to (or victimising) a whistleblower and for breaching a whistleblower's confidentiality

d) Gives protections for whistleblowers in limited circumstances if they disclose to a journalist or parliamentarian after they have reported to ASIC or APRA their concerns about substantial and imminent danger to the health or safety of one or more people or to the natural environment or matters in the public interest after 90 days

e) Provides whistleblowers with easier access to compensation and remedies if they suffer detriment, including protections from costs orders unless a court finds the claim to be vexatious or the whistleblower acted unreasonably, and

f) Requires all public companies, large proprietary companies, and corporate trustees of registrable superannuation entities to have a whistleblower policy from 1 January 2020. The Corporations Act sets out at a high level what a whistleblower policy should contain. These are:

- I. Information about the protections available to whistleblowers, including protections under the law
- II. Information about to whom disclosures that qualify for protection under the law may be made, and how they may be made. This will be important for whistleblowers to be sure of the company's arrangements, given that a company can authorise particular staff or third parties to receive disclosures from whistleblowers
- III. Information about how the company will support whistleblowers and protect them from detriment
- IV. Information about how the company will investigate disclosures that qualify for protection under the law. This will be important for whistleblowers to understand how their reports and their personal information will be handled during any investigation
- V. Information about how the company will ensure fair treatment of employees of the company who are mentioned in disclosures that qualify for protection under the law, or to whom such disclosures relate
- VI. Information about how the policy is to be made available to officers and employees of the company, and
- VII. Any matters prescribed by the regulations (no regulations have yet been prescribed).

ASIC also released Regulatory Guide 270 Whistleblower policies (RG 270) to help entities establish a whistleblower policy that complies with their legal obligations.

## 1.5 DISPENSATIONS AND WAIVERS

- 1.5.1 Dispensations and Waivers should be requested and approved in only exceptional circumstances. Absent such circumstances, employees are obligated to be in full compliance with all Policy Documents. Dispensations and Waivers must be approved and documented in accordance with the requirements set forth in the [Policy Governance Standard](#).

## 1.6 EFFECTIVE DATE / TRANSITION PERIOD

- 1.6.1 This Policy is effective from 1 January 2020, and will be updated as and when required.

# 2 GOVERNANCE

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## 2.1 BOARD APPROVAL

- 2.1.1 This Policy does not require approval by the Board of Directors, or subcommittees of the Board of Directors, of Citigroup Inc. and Citibank N.A. However, notice of its issuance and any subsequent revisions may be reported to the Board at the request of the Board or Citi Management. Subsidiary Board approvals may be required in local jurisdictions, or by other legal entities.

- 2.1.2 This Policy will be reviewed annually and presented to the SOoA and Citigroup Pty Limited (GPL) and

## 2.2 GOVERNANCE COMMITTEES

- 2.2.1 The relevant governance committee for this Policy is the governance committee for the Risk Categories on the cover page. The mapping of the Risk Categories to governance committee hierarchies is detailed in the [Citi Governance Policy](#).

## 3 POLICY PROVISIONS

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### 3.1 KEY DEFINITIONS

#### 3.1.1 Australian Law

Australian law means the Corporations Act 2001 and Taxation Administration Act 1953.

#### 3.1.2 Director

Director means a person appointed or acting as a Senior Officer outside Australia (SOoA), a Board Director, or alternate to a Board Director of:

- Citi, or
- a foreign Related Body Corporate of Citi.

#### 3.1.3 Eligible Disclosure

An Eligible Disclosure is a disclosure that is made by an Eligible Whistleblower, to an Eligible Recipient (whether openly, confidentially, or anonymously), about an Eligible Matter.

#### 3.1.4 Eligible Whistleblower

Eligible Whistleblower means Citi's existing and former employees or Officers, suppliers of services or goods to Citi and their employees (whether paid or unpaid), and Citi associates<sup>1</sup>.

Relatives, spouse, or dependents of an Eligible Whistleblower are also included. An Eligible Whistleblower also includes a trustee, custodian or investment manager of a Citi Superannuation Entity.

#### 3.1.5 Eligible Matter

Eligible Matter means a disclosure, where the discloser has reasonable grounds to suspect the information:

- a) Concerns misconduct, or an improper state of affairs in relation to Citi or its foreign Related Body Corporate (e.g., dishonest or unethical behavior, conduct that cause harm or prohibited by Citi's Code of Conduct); or
- b) indicates that Citi or its foreign Related Body Corporate, or an Officer or employee of Citi or its foreign Related Body Corporate, has engaged in conduct that:
  - constitutes an offence against, or a contravention of the *Corporations Act*, *Australian Securities and Investments Commission Act 2001*, *Banking Act 1959*, *Financial Sector (Collection of Data) Act 2001*, *Insurance Act 1973*, *Life Insurance Act 1995*, *National Consumer Credit Protection Act 2009*, *Superannuation Industry (Supervision) Act 1993*, or an instrument made under the above legislations, or
  - constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more, or
  - represents a danger to the public or the financial system; or
- c) indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the entity or an associate (within the meaning of Section 318 of the *Income Tax Assessment Act 1936*) of the entity, and considers that the information may assist the eligible recipient to perform functions or duties in relation to the tax affairs of the entity or an associate (within the meaning of Section 318 of the *Income Tax Assessment Act 1936*) of the entity.

Note that the discloser can still qualify for protection even if their disclosure turns out to be incorrect, however

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<sup>1</sup>Citi associates is as defined under the Corporations Act 2001 and s318 of the Income Tax Assessment Act 1936.

protection is unavailable where the discloser did not believe the information to be true.

#### Some work related grievances are not covered

Eligible Matters does not include personal work related grievances unless it relates to whistleblower victimisation. Personal work related grievances that do not qualify for protection must be escalated to Human Resources<sup>2</sup>.

Below are some examples of personal work-related grievances that are not protected disclosures unless it relates to whistleblower victimisation:

- a) an interpersonal conflict between the discloser and another employee;
- b) a decision relating to the engagement, transfer or promotion;
- c) a decision relating to the terms and conditions of engagement; and
- d) a decision to suspend or terminate the engagement, or otherwise to discipline the discloser.

### 3.1.6 Eligible Recipients

Eligible Recipients means any of the following:

- a) Senior Manager, Director, Company Secretary, Officer, Auditor, Actuary of Citi or a foreign Citi Related Body Corporate,
- b) the Citi Ethics Office,
- c) a Director of the Trustee of a Citi superannuation entity, or a person authorised by the Trustee to be an Eligible Recipient, or
- d) if the disclosure relates to a taxation matter, a registered Tax Agent/Business Activity Statements (BAS) agent who provides tax agent services or BAS services to Citi, and any employee or Officer who has functions or duties relating to Citi's tax affairs.

Note that protection is also available if the disclosure:

- is made to Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) or another prescribed Commonwealth authority prescribed by regulation,
- is made to a lawyer for the purpose of obtaining legal advice or representation about the operations of the whistleblower protections under Australian law,
- is of public interest or relates to a health and safety emergency, and is made to a journalist or a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory provided certain statutory requirements have been satisfied. Refer to Section 1317AAD of the *Corporations Act 2001* for further information on protection eligibility criteria for these disclosures, or
- the disclosure relates to a tax matter and is made to the Tax Commissioner and the discloser considers that the information may assist the Tax Commissioner to perform his or her functions or duties under a taxation law in relation to the entity or an associate (within the meaning of Section 318 of the *Income Tax Assessment Act 1936*) of the entity.

### 3.1.7 Officer

Officer is as defined in Section 9 of the *Corporations Act 2001*.

### 3.1.8 Related Body Corporate

Related Body Corporate is as defined in Section 9 of the *Corporations Act 2001*.

### 3.1.9 Senior Manager

Senior Manager is as defined in Section 9 of the *Corporations Act 2001* to mean a person (other than a director or secretary of the corporation) who:

- a) makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of Citi; or
- b) has the capacity to affect significantly Citi's financial standing.

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<sup>2</sup>These disclosures may be protected under other legislation, such as the Fair Work Act 2009.

This includes the following individuals within Citi:

- c) Members of the Executive Committee,
- d) Accountable Persons per the CBNA Financial Accountability Regime Policy,
- e) Responsible Person per the CBNA Fit and Proper Policy, and
- f) An individual of a foreign Citi Related Body Corporate that are equivalents of the above.

### 3.1.10 Superannuation Entity

Superannuation Entity is as defined under the *Superannuation Industry (Supervision) Act 1993*.

## 3.2 HOW TO MAKE A DISCLOSURE THAT QUALIFIES FOR PROTECTION

The Australian law provides protection to individuals who make disclosures about certain matters. It is important for an individual to be aware of how they can qualify for this protection.

To qualify for this protection, the individual must make an Eligible Disclosure.

An Eligible Disclosure is a disclosure that is:

- made by an **Eligible Whistleblower**, and  
about an **Eligible Matter**, and
- made **directly to an Eligible Recipient**,

Refer to Section 3.1.4, 3.1.5, 3.1.6 for definitions of the above terms.

Refer to Section 3.5 for details on protection available for Eligible Disclosures.

Disclosures can be made to the Citi Ethics Office, which is an Eligible Recipient, designated to receive whistleblower disclosures. Alternatively, an individual can also disclose a matter to other Eligible Recipients, as defined under Section 3.1.6.

### **Citi Ethics Office**

The Citi Ethics Office is an Eligible Recipient designated by Citi to receive whistleblower disclosures. An individual is able to make a disclosure anonymously and/or confidentially to the Ethics Office 24 hours per day, seven days per week in multiple languages via the Citi Ethics Hotline or making an online website submission to the Ethics Office.

Information on how to access the Citi Ethics Hotline is available in the Citi Code of Conduct.

## 3.3 RESPONSIBILITIES OF INDIVIDUALS WHO MAKE A DISCLOSURE

The individual must understand how they can make an Eligible Disclosure and the protections available under this Policy.

Individuals are encouraged to seek independent legal advice if they are unsure how whistleblower protection applies under Australian law, or how it applies to their circumstance.

When making a disclosure, the individual must only tell the Eligible Recipient.

It is recommended the individual clarifies to the Eligible Recipient if they wish to make a disclosure anonymously or if they give their consent for their identity to be disclosed when the Eligible Recipient passes the disclosure to the Ethics Office (if the Eligible Recipient wasn't the Ethics Office) or when the Ethics Office pass the information to the appropriate investigator.

## 3.4 RESPONSIBILITIES OF ELIGIBLE RECIPIENTS WHO RECEIVE A DISCLOSURE

The eligible recipient must be aware that there are severe penalties under the Australian law for:

- disclosing the identity of an individual qualifying for protection, or disclosing information that is likely to identify the individual. Refer to Section 3.5.2 for exceptions to protection of anonymity and confidentiality, and
- causing or threatening detriment to an individual on the basis of a belief or suspicion that the individual or another person has made, proposes to make, or could make an Eligible Disclosure. Refer to Section 3.5.3 for Citi's policy on retaliation, harassment, and victimisation.

### 3.4.1 Anonymous disclosures

The eligible recipient must respect the individual's wishes to remain anonymous.

If an individual wants to remain anonymous, upon receiving an Eligible Disclosure, the Eligible Recipient must:

- refer the individual to read a copy of this policy (if they haven't already) and encourage the individual to contact the Citi Ethics Office directly; and
- the Eligible recipient must escalate the concern directly to the Citi Ethics Office but when doing so, the Eligible recipient must not provide the individual's name or other identifying information when escalating the concern, or to others.
- not disclose to others details of the content of the disclosure or the identity of the individual. The Ethics Office will perform its investigations on the matter, to the extent it can, based on the anonymous information provided. Any substantiation of matters, based on the anonymous disclosure, will be appropriately managed, following established internal processes.

If an individual does not provide their consent to their identity being disclosed, the Eligible Recipient is permitted to disclose their identity to a legal practitioner but only for the purposes of obtaining legal advice or legal representation about the disclosure.

### 3.4.2 Known Disclosures

Upon receiving an Eligible Disclosure, the Eligible Recipient must:

- Obtain the individual's consent that they can disclose the person's details to the Ethics Office when escalating the concern. It is recommended the Eligible Recipient obtains the consent, in writing, if the individual is agreeable to that.
- Escalate the concern directly to the Citi Ethics Office.
- Not disclose to others details of the content of the disclosure. The Ethics Office will perform its investigations on the matter. Any substantiation of matters, based on the disclosure, will be appropriately managed, following established internal processes.

### 3.4.3 Protection for the Eligible recipient

When an eligible recipient escalates a matter, they too become an eligible discloser themselves.

The eligible recipient must consider Section 3.2 and understand how they can also qualify for protection under Australian law.

## 3.5 WHISTLEBLOWER PROTECTION AVAILABLE

The following whistleblower protections are available to an individual who makes an Eligible Disclosure from the time the disclosure is made.

### 3.5.1 General protections

- The individual is not subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure. This protection does not grant immunity for any misconduct the individual has engaged in that is revealed in their disclosure;
- The individual has immunity from lawsuit from making the disclosure;
- No contractual or other remedy may be enforced, and no contractual or other right may be exercised, against the individual on the basis of the disclosure;
- Under circumstances prescribed under Section 1317AA of the *Corporations Act 2001*, if the disclosure is made to ASIC, APRA, or a prescribed Commonwealth authority, the information is not admissible in evidence against the individual in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.

### 3.5.2 Anonymous and confidential disclosure

An individual who qualifies for protection has the right to anonymity and confidentiality unless they consent to their identity being disclosed.

Statutory penalties apply to unauthorized disclosure of an individual's identity, if the individual qualifies for whistleblower protection. The individual may lodge a complaint by contacting the Citi Ethics Office, or alternatively, with a regulator, such as ASIC, APRA or the ATO, for investigation of a breach of anonymity..

A discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. Citi however, may not be able to undertake an investigation if it is not



able to contact the discloser.

This protection does not extend to disclosure of the discloser's identity to ASIC, APRA, a member of the Australian Federal Police; or a lawyer for the purpose of obtaining legal advice or legal representation in relation to the operation of the Australian law.

#### 3.5.2.1 Disclosure of information to the Ethics Office for investigation

The information contained in a disclosure can be disclosed by an Eligible Recipient to the Ethics Office provided the information passed on:

- a) does not include the individual's identity; and
- b) does not include information that is likely to lead to their identification.

#### 3.5.3 Protection from retaliation, harassment / victimisation

There are severe penalties under the Australian law for causing or threatening detriment<sup>3</sup> to an individual for making or proposing to make an Eligible Disclosure.

Citi prohibits any form of retaliatory action against anyone who makes an Eligible Disclosure.

Retaliation is a serious issue and includes any adverse action taken because an employee has engaged in such activity. As part of any investigation, Citi respects the rights that are afforded under applicable laws and regulations to all parties related to the matter.

Allegations of retaliatory action, harassment, or victimization must be escalated to the Citi Ethics Office.

A person who retaliates against another individual for raising Concerns, or being involved in an investigation will be subject to action under the disciplinary procedure up to and including termination of employment or other relations with Citi.

### 3.6 HOW ELIGIBLE DISCLOSURES ARE INVESTIGATED

Citi believes it is essential an individual feels secure when raising a concern and encourages individuals to communicate their Concerns openly. Individuals may be interviewed as part of that investigation. All contacts and investigations are treated as confidentially as possible, consistent with the need to investigate the matter, subject to applicable laws and regulations, and conducted in a timely manner. Investigators must only disclose information on a need-to-know basis and must otherwise safeguard and take appropriate steps to prevent the unauthorised disclosure of such confidential information.

Upon receiving a disclosure, the Citi Ethics Office will assign the matter to the appropriate function for investigation, documentation, and reporting in accordance with its investigation procedures.

An assessment of whether a disclosure qualifies for statutory whistleblower protection, and a risk assessment of detriment against a discloser is performed with an assessment outcome advised to the investigator where appropriate. Appropriate actions will be undertaken to reduce potential detriment to the discloser.

The investigator will contact the discloser (if the matter is not anonymous) throughout the investigation process to assist with the investigation.

The discloser will be sent an acknowledgement after the disclosure is received, and will be informed by the investigator once the investigation is concluded. The discloser will not be provided with the outcome where it is inappropriate to do so.

Findings from investigations will be documented and reported in accordance with respective procedures. Method for documenting and reporting of findings will depend on the nature of the disclosure.

Disclosers are to contact the Citi Ethics Office if their identity has been exposed without their consent.

### 3.7 FAIR TREATMENT AND SUPPORT OF INDIVIDUALS WHO MAKES, OR ARE MENTIONED IN AN ELIGIBLE DISCLOSURE

When concerns are raised with respect to possible misconduct or unethical behavior,

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<sup>3</sup>Examples of detriment include but not limited to: dismissal of an employee, harassment or intimidation or discrimination, alter an individual's position or duties to their disadvantage, damage to a person's reputation, property, or other damage. Note that actions such as managing a discloser's unsatisfactory work performance is not considered to be detrimental conduct, if the action is in line with Citi's performance management framework.

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Citi conducts investigations thoroughly, fairly, with discretion, and in a timely manner in line with values stated in the Citi Code of Conduct.

An individual that is the subject matter of a disclosure will be:

- advised the disclosure as and when required by procedural fairness,
- advised of any referrals to a regulator or law enforcement as appropriate, subject to any regulatory requirements or obligations,
- advised of the outcome of the investigation as and when appropriate.

Various support is also available depending on the circumstances, to the individual who makes, or are mentioned, in an eligible disclosure for example:

- Employee Assistance Program provides confidential counselling and coaching to the employee and their immediate family free of charge.
- Targeted programs are available depending on individual circumstances.
- Leave options including one paid Health & Wellbeing day per annum.
- Return to Work Support via Specialist Rehabilitation Providers if further support is required on returning from leave.
- Online support via [Citi For You/Minds at Citi](#) including a range of psychological support, tools and information.

Further information on the support that are available must be directed to Human Resources.

### 3.8 GETTING ADVICE

Please direct general questions in relation to the Policy to the CRCO in Australia.

Individuals are encouraged to seek independent legal advice if they are unsure how whistleblower protection applies under Australian law, or how it applies to their circumstances.

### 3.9 ENSURING THIS POLICY IS EASILY ACCESSIBLE

This policy must be made available on Citi's external website along with a copy available on the internal Citi policy directory.

## 4 EXECUTION ASSESSMENT

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### 4.1 RISK MANAGEMENT & MANAGER'S CONTROL ASSESSMENT ("MCA")

- 4.1.1 The risks addressed by this Policy must be identified, measured, monitored, controlled and reported in accordance with the [Enterprise Risk Management Framework](#). In addition, the processes involved in the execution of this Policy Document must be included in the relevant MCA, to the extent required by, and in accordance with the [Control Standard](#) and the [Manager's Control Assessment \(MCA\) Standard](#), or any documents that replace those Policy Documents.
- 4.1.2 Policy is subject to periodic assurance (monitoring) and testing pursuant to the [Global Manager's Control Assessment \(MCA\) Procedure](#) and [ICRM Compliance Independent Assessment Procedure](#) as applicable.

### 4.2 BREACH REPORTING AND ESCALATION

- 4.2.1 A breach is any instance of non-compliance with this Policy in the absence of a Waiver or Dispensation. All breaches must be reported and escalated on a timely basis as detailed in the [Policy Governance Policy](#), [Policy Governance Standard](#), the [Escalation Policy](#) and the [Global Issues Management Policy](#).

### 4.3 DATA GOVERNANCE

- 4.3.1 Enterprise Data, as defined in the [Citi Data Governance Policy](#) (CDGP), must be managed and maintained in compliance with the CDGP, [Citi Data Governance Standard](#) (CDGS), and Procedures maintained by Data Leads for your Business or Function. The CDGP and CDGS set forth the requirements for:
- Creation, consumption, usage, and ownership of Enterprise Data.
  - Data quality management, including how to document concerns regarding Enterprise Data quality.
  - Data quality controls to meet data consumer requirements.

- 4.3.2 **Data Governance Contacts:**

- Questions related to CDGP and CDGS compliance should be directed to your Data Leads (or delegates).
- Questions related to Enterprise Data and Data Quality controls should be directed to the appropriate Data Owner identified in the Operating Facts Manager (OFM) system.

## 4.4 TRAINING

- 4.4.1 Training for this Policy is assessed on an annual basis. If needed, training is developed for relevant products, geographies, and functions using a risk-based approach. Any required training that is determined as needed is developed and deployed in accordance with the [Global Training Standard](#) or its implementing Policy Documents.
- 4.4.2 General training relating to Australia whistleblower requirements are provided by ICRM periodically. The CRCO Australia or delegate is responsible for reviewing and approving such training.

## 5 ROLES & RESPONSIBILITIES

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### 5.1 RISK ACCOUNTABLE RESPONSIBILITIES

Individuals must not cause or threaten detriment<sup>4</sup> to an individual for making or proposing to make an Eligible Disclosure. Severe penalties under the Australian law may apply to any offenders.

#### 5.1.1 Individual who makes a disclosure

It is the responsibility of the individual who make a disclosure to understand how they can make an Eligible Disclosure and the protections available under this Policy. Individuals are encouraged to seek independent legal advice if they are unsure how whistleblower protection applies under Australian law, or how it applies to their circumstances. Please refer to Section 3.3 for further information.

#### 5.1.2 Individual who receives a disclosure

Please refer to Section 3.4 for responsibilities of individuals who receives a disclosure.

#### 5.1.3 Individual who investigates a disclosure

Investigators must conduct investigations thoroughly, fairly, with discretion, and in a timely manner in line with values stated in the Citi Code of Conduct. As part of any investigation, Citi respect the rights that are afforded under applicable laws and regulations to all parties related to the matter. Refer to Section 3.6 for an overview of how Eligible Disclosures are investigated. Please refer to the Citi Ethics Office for more information on investigator's responsibilities.

### 5.2 SECOND LINE OF DEFENCE

#### 5.2.1 Independent Compliance Risk Management (ICRM)

- This policy is owned and maintained by ICRM, reviewed on a periodic basis.
- To develop and deliver training relating to this policy on a periodic basis.
- To provide periodic updates to the Board / SOoA or equivalent on the effectiveness of the whistleblower program.

### 5.3 ENTERPRISE SUPPORT

#### 5.3.1 Ethics Office

- Assess eligible matters and refer to the appropriate function for investigation, documentation and reporting in accordance with its investigation procedures.
- Develop and maintain investigation procedures.
- Provide periodic updates to ICRM CRCO Australia or equivalent on the volumes and themes of matters received, whether or not matters have been substantiated, and any ensuing consequence management actions taken.

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<sup>4</sup>Examples of detriment include but not limited to: dismissal of an employee, harassment or intimidation or discrimination, alter an individual's position or duties to their disadvantage, damage to a person's reputation, property, or other damage. Note that actions such as managing a discloser's unsatisfactory work performance is not considered to be detrimental conduct, if the action is in line with Citi's performance management framework.

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- Escalate, in a timely manner, to ICRM CRCO Australia any instances where anonymity has been compromised without an individual's consent or instances of retaliation or victimization against an individual raising a concern or any other breach of this policy.

## 6 REFERENCED POLICY DOCUMENTS

### 6.1 The following documents set forth requirements for the implementation of this Policy:

#### 6.1.1 Standards

- *Nil*

#### 6.1.2 Procedures

- *Nil*

### 6.2 Other Policy Documents referenced in this Policy include:

#### 6.2.1 Framework

- [Citi Code of Conduct](#)
- [Enterprise Risk Management Framework](#)

#### 6.2.2 Policies

- [Citi Employee Complaints Policy](#)
- [Citi Escalation Policy](#)
- [Citi Data Governance Policy](#)
- [Global Issues Management Policy](#)
- [Policy Governance Policy](#)

#### 6.2.3 Standards

- [Citi Data Governance Standard](#)
- [Control Standard](#)
- [Global Training Standard](#)
- [Manager's Control Assessment \(MCA\) Standard](#)
- [Policy Governance Standard](#)

#### 6.2.4 Procedures

- [ICRM Compliance Independent Assessment Procedure](#)

## 7 Version Control Log

Date (mm-dd-yy)	Version Type	Version Number	Description of Revision
1-1-2020	Initial release	1.0	Initial release of document as an addendum to the Escalation Policy.
7-1-2022	Substantive change	2.0	<ul style="list-style-type: none"> <li>• Conversion from addendum to the Escalation Policy to a stand alone policy.</li> <li>• 3.1.9 definition of Senior Manager - Removed references to CPL Accountable Persons and Responsible Persons.</li> </ul>
8-10-2022	Non-Substantive change	2.1	<ul style="list-style-type: none"> <li>• Update policy document to align with Citi's new policy format.</li> <li>• 1.5 Key Obligations was added as per new policy format.</li> </ul>
11-6-2023	Non-substantive change	2.2	<ul style="list-style-type: none"> <li>• Update policy document to align with Citi's new policy format. Includes minor editing revisions and updates to Section 5 roles and responsibilities.</li> <li>• Updated to reference to the Employee Complaints Policy (introduced in Feb 2022)</li> <li>• New section 3.9 added – requiring the policy to be easily accessible</li> <li>• Sections 3.3 and 3.4 updated to align with current practices and</li> </ul>

12-9-2024	Administrative	2.3	learnings from ASIC Report 758. <ul style="list-style-type: none"><li>• Conversion to new Policy Template and nomenclature updates post re-organisation at Citi.</li><li>• Replace reference to the Banking Executive Accountability Regime with the Financial Accountability Regime effective 15 March 2024.</li></ul>