

Australia Speak Up Policy

Purpose

In line with our Global Speak Up Policy (**Global Policy**), BT Australasia Pty Ltd (**BT**) is committed to conducting business in an open and honest manner in Australia. BT seeks to promote an environment where our people can act in BT's best interests and feel comfortable to speak up when they see or suspect wrongdoing. We believe in a culture of openness and accountability in order to protect BT's reputation as an ethical and responsible company.

The purpose of this Australian Speak Up policy (**Policy**) is to build on the Global Policy in an Australia-specific context and ensure BT remains compliant with its obligations under Australian law, including the *Corporations Act 2001* (Cth) (**Corporations Act**). This Policy also aims to reinforce the principles established under the Global Policy and ensure that people feel safe and know how to report actual or suspected improper conduct in good faith and in an environment free from victimisation.

This Policy and the Global Policy is made available and can be found on BT's website located here: <https://intra.bt.com/bt/lgc/compliance/speakup/Pages/index.aspx>

Who does this Policy apply to?

This Policy applies to all current and former:

- BT employees;
- BT officers;
- individuals supplying goods or services to BT (paid and unpaid);
- employees of people who supply goods or services to BT (paid and unpaid); and
- relatives or dependents of the individuals referred to above (and dependents of the spouse of the individuals referred to above),

collectively "**Relevant Persons**".

Relevant Persons who make disclosures in accordance with this Policy are eligible for protection under the *Corporations Act 2001* (Cth) (**Corporations Act**) if:

- they make a disclosure of information relating to a "disclosable matter" to an "eligible recipient" (as those terms are defined below);
- they make a disclosure to a legal practitioner for the purpose of obtaining legal advice; or
- they make an emergency or public interest disclosure.

Matters this Policy applies to

This policy applies to information that the individual has reasonable grounds to suspect concerns misconduct or an improper state of affairs relating to BT or a related body corporate (collectively, "**Disclosable Matters**").

Disclosable Matters do not necessarily involve unlawful conduct. Examples of Disclosable Matters include:

- dishonest or corrupt behaviour including theft or misappropriation of funds or property, receiving kickbacks or money, excessive gifts, bribery and colluding with others to cheat BT;
- significant mismanagement or waste of BT funds or resources;
- illegal activity including illegal drug sale or use, violence or threatened violence against another person, sexual harassment and property damage;
- serious harm to public health, safety or environment;
- unethical behaviour or a serious impropriety;
- abuse of authority;
- breach of regulations or laws;
- breach of BT policies and procedures;
- impeding internal or external audit processes or investigations;
- concealment of improper conduct;
- conduct that represents a danger to the public or BT's financial system; or
- any other conduct which may be detrimental to the interests of BT.

Individuals qualify for protection even if the conduct they have disclosed is determined not to be actual misconduct, provided the individual has reasonable grounds to suspect misconduct or an improper state of affairs or circumstances. If you are acting in good faith, you will be protected under this Policy.

Matters this Policy does not apply to

For the purpose of this Policy, concerns about your own employment and personal work-related grievances do not qualify for protection under the Corporations Act. Examples of grievances that fall outside the scope of this Policy include:

- personal conflicts with colleagues or managers;
- a decision that does not involve a breach of workplace laws;
- disagreements over performance markings; and
- a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

There are more appropriate processes for dealing with these types of work-related grievances. We recommend you share any such grievances with your line manager or local Head of HR in the first instance and, if appropriate, escalate your concerns through BT's internal grievance process. The

grievance process includes checks, balances and safeguards to enable your concern to be dealt with independently and fairly. BT's internal grievance process is available on BT's HR Home.

Personal Work-Related Grievances may still qualify for protection if:

- the grievance includes information about reportable conduct;
- BT breaches employment or other laws punishable by imprisonment for a period of 12 months or more, engages in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the individual's personal circumstances;
- the individual suffers detrimental conduct for making a disclosure; or
- the individual seeks legal advice or representation about the operation of the protections under the Corporations Act.

Disclosures not made in good faith, or that are vexatious or knowingly false, may subject the individual to disciplinary action, up to and including termination of employment.

How to make a disclosure

Where you know, or suspect, that someone working for, or on behalf of, BT is operating in a way that is unethical or non-compliant with legislation or BT policies to the extent it is considered a Disclosable Matter, it is important that you raise this. Disclosures may be made anonymously or by using a pseudonym. Individuals can decline to answer questions that they believe may reveal their identity during any follow-up questions.

Individuals can make a disclosure in a number of different ways both internally and externally of BT. While we would like you to provide as much information as possible when making a disclosure, we don't expect you to always be able to provide full evidence of your suspicion or concern.

Each disclosure method is described in more detail below.

Depending on the nature of the concern, individuals who speak up may wish to informally raise the matter with their line manager, senior line management or HR (collectively, "**Eligible Recipients**"). In many cases the person to whom such a report is made may be able to agree to an effective way of resolving the concern.

We recognise that there may be situations where individuals feel they cannot raise a concern within their office, or to their line manager, senior line management or HR, and in those situations concerns about suspected wrongdoing can be raised with "Speak Up" in accordance with this Policy.

Speak Up is a free, confidential and independent service that anyone who works for or on behalf of BT can contact to share concerns about Disclosable Matters. Individuals can access Speak Up on the web or by telephone by following the prompts at <https://btspeakup.ethicspoint.com/>.

Speak up is managed by an independent third party. Each disclosure with Speak Up is treated in complete confidence and will be sent to the appointed contact at BT for review. You may make your report anonymously if you wish.

Individuals are also entitled to protection if they make a report:

- to an officer or senior manager of BT or a related body corporate;

- to an auditor, or member of an audit team conducting an audit, of BT or a related body corporate;
- to an actuary of BT or a related body corporate;
- to a legal practitioner for the purposes of obtaining legal advice;
- to ASIC, APRA, the Australian Federal Police or another Commonwealth body prescribed by the Corporations Act (**Regulatory Authority**);
- if it qualifies as a public interest disclosure (which includes a disclosure of information to a journalist or a parliamentarian in accordance with the Corporations Act); or
- if it qualifies as an emergency disclosure (which includes a disclosure of information to a journalist or a parliamentarian in accordance with the Corporations Act).

Legal protection, support and practical protection

Individuals are entitled to protection under the Corporations Act in circumstances where the Disclosable Matter is disclosed in accordance with this Policy. Each of the protections afforded to individuals who speak up are described below.

1. Identity protection

The identity of an individual who speaks up, and information likely to lead to the identification of the individual, will be kept strictly confidential unless:

- the individual consents to the disclosure;
- the disclosure is required or permitted by law; or
- the individual discloses their identity to a Regulatory Authority or legal practitioner.

BT may disclose information contained in a disclosure without the consent of an individual if:

- the information does not include the individual's identity;
- BT has taken all reasonable steps to reduce the risk that the individual will be identified from the information; and
- it is reasonably necessary to investigate the issues mentioned in the disclosure.

Apart from the circumstances set out above, it is illegal to identify an individual who speaks up or discloses information that is likely to lead to the identification of the individual.

We are committed to protecting the privacy of everyone involved in a Disclosable Matter and will do everything reasonable to safeguard personal data from unauthorised access or processing. Any personal data obtained will only be used for the purposes of investigating your concern, monitoring for any signs of retaliation or retribution, and to comply with legal requirements.

Individuals can complain about a breach of confidentiality in connection with a disclosure by contacting a Regulatory Authority. In addition, individuals can seek compensation and other

remedies through the courts if they suffer loss, damage or injury because of a disclosure and BT failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

2. Protection from detrimental acts or omissions

We appreciate that it takes courage to speak up, and we will do everything we can to support and protect you. We will not permit anyone to retaliate against you, victimise you or treat you adversely for sharing your concerns with us in good faith. If someone tries to deter you from speaking up, we will treat it as a disciplinary offence and address it seriously at every level of our organisation.

Individuals will be protected from actual or threatened detrimental conduct in connection with them having made a disclosure. A person cannot subject an individual to detrimental conduct if they believe or suspect the individual made, may have made, or could make a disclosure that qualifies for protection, and that belief or suspicion is the reason or part of the reason for the detrimental conduct.

If you feel you have been retaliated against for using Speak Up or otherwise making a disclosure, please let us know by contacting the Speak Up hotline by web or by phone by following the prompts at <https://btspeakup.ethicspoint.com/>. Individuals who speak up will be protected from actual or threatened detrimental conduct in connection with them having made a disclosure.

Individuals are encouraged to raise concerns with their line manager, senior line management and HR if they believe they are being subject to actual or threatened detrimental conduct, or if this Policy is not being complied with in connection with a disclosure they have made.

BT will treat any actual or threatened detrimental conduct relating to an individual seriously, and deal with it in accordance with our disciplinary framework.

3. Civil, criminal and administrative liability protection

Under the Corporations Act, as well as other Commonwealth legislation, individuals who speak up are afforded additional protections including immunity from civil, criminal or administrative liability as a result of making a disclosure. However, individuals do not have immunity in relation to any misconduct they have engaged in that is revealed in their disclosure.

4. Legal redress

Individuals who speak up may seek compensation or other remedies if they have suffered loss, damage, or injury as a result of making a disclosure in accordance with this policy and BT did not take reasonable precautions and exercise due diligence to prevent the detrimental conduct. Individuals should obtain independent legal advice in relation to exercising such rights.

Handling and investigating a disclosure

All disclosures will be reviewed, investigated where appropriate, and resolved by BT in accordance with this Policy. The individual who speaks up may be informed of the outcome of the investigation, where legally permissible to do so. The information provided may be limited due to confidentiality.

Disclosable Matters will be investigated by BT. The investigation will be conducted in a confidential, fair and objective manner.

If the disclosure is within the ambit of this Policy, a formal, thorough investigation will be commenced including assessing:

- the nature, scope, and timing of the investigation;
- how much information has been provided;
- the seriousness of the concern;
- the credibility of the report;
- the likelihood that BT will be able to find sufficient additional evidence to confirm the concern;
- the individuals (both internal and external to BT) that should be involved in the investigation;
and
- what professional advice may be required to support the investigation.

The investigation process will vary depending on the nature of the reportable conduct and the amount of information provided by the individual. BT's investigation process may be limited in certain aspects, for example where BT is unable to contact the individual for more information.

The Speak Up Manager will provide disclosers with regular updates if the discloser can be contacted (including through anonymous channels).

Findings from an investigation will be documented and reported to the Speak Up Forum. The method for documenting and reporting the findings will depend on the nature of the disclosure and in some circumstances, it may not be appropriate to provide details of the outcome to the discloser.

Questions

If you have any questions about this Policy speak to your local HR team.