

## Sydney Airport Limited Whistleblower Policy

### 1. Our whistleblower policy

We are committed to maintaining the highest standards of integrity and to ensuring that all our people act ethically and responsibly. This is reflected in our Values and our Code of Conduct.

The aim of this whistleblower policy is to support our Values and Code of Conduct by:

- encouraging you to speak up if you have concerns about known or suspected unlawful, unethical or irresponsible behaviour within the Sydney Airport Group;
- making you feel confident about raising your concerns by providing a reporting and investigation system that is safe, confidential, reliable and transparent; and
- ensuring that you are supported and protected from reprisal or detriment if you do raise concerns.

We have adopted this policy to help us identify wrongdoing or an improper state of affairs or circumstances that may not be uncovered unless there is a safe means for our people to report it. This policy also assists us in complying with our obligations under Whistleblower Legislation.

### 2. What does this policy deal with?

This policy describes:

- the protections available for people who report wrongdoing or an improper state of affairs or circumstances, including the protections available under the whistleblowing provisions of the Whistleblower Legislation, and the circumstances in which those protections are available;
- how we investigate reports that qualify for protection under this policy and the Whistleblower Legislation, including how we ensure fair treatment of employees who are mentioned in such reports; and
- how this policy and the protections described in it will be made available to Eligible Persons.

### 3. Definitions

In this policy:

**AFP** means the Australian Federal Police.

**APRA** means the Australian Prudential Regulation Authority.

**ASIC** means the Australian Securities and Investments Commission.

**Authorised Recipients** are persons who you can disclose to under this policy and are identified at section 6.1 below.

**Code of Conduct** means the document contained [here](#).

**Eligible Persons** are persons who can make a disclosure under this policy and are described at section 4 below.

**Protected Report** is a report that is protected under this policy and the Whistleblower Legislation and occurs when an Eligible Person makes a report about Reportable Conduct to Authorised Recipients or one of the persons or regulators described at section 6.4 below).

**Reportable Conduct** is conduct that can be reported under this policy and is described at section 5.1 below.

**Sydney Airport Group** means Sydney Airport Limited and its related bodies corporate.

**Values** means the values contained [here](#).

**Whistleblower Legislation** refers to the Corporations Act 2001 (Cth) and Taxation Administration Act 1953 (Cth), both of which provide for the protection of whistleblowers.

#### 4. Eligible Persons

The protections under this policy apply where a report is made by an Eligible Person. The following people are Eligible Persons:

- a full-time, part time or casual employee of, or a consultant or contractor to, the Sydney Airport Group;
- a supplier of goods or services to the Sydney Airport Group, whether paid or unpaid, or an employee of any such supplier;
- a director, officer or company secretary of any entity within the Sydney Airport Group; and
- a relative or dependant of any person referred to in any of the preceding bullet points, or a dependant of any such person's spouse.

#### 5. Reportable Conduct

##### 5.1 What is Reportable Conduct?

The protections under this policy apply to reports about Reportable Conduct. Reportable Conduct is any conduct in relation to the Sydney Airport Group or its operations that:

- is fraudulent, dishonest, corrupt, illegal or unethical;
- breaches any law;
- constitutes a breach of trust or gives rise to a conflict of interest;
- is negligent or involves substantial mismanagement of resources;
- represents a danger to the public or the financial system or otherwise poses a substantial risk to health, safety or the environment; or
- otherwise gives rise to an improper state of affairs or improper circumstances,

or the deliberate concealment of any such conduct

## 5.2 When should you report your concerns?

You are encouraged to report any conduct that you know or have reasonable grounds to suspect is conduct of the type described above. As long as you have reasonable grounds to suspect that Reportable Conduct has occurred or may occur then if you are an Eligible Person, your report qualifies for protection under this policy and the Whistleblower Legislation, even if that suspicion turns out to be incorrect.

## 5.3 False reporting

Deliberate false reporting will not be tolerated. False reports could have significant effects on the reputation of the Sydney Airport Group and the personal reputations of other people and may also lead to a significant waste of time and effort. Any person found to have made a deliberate false report may be subject to disciplinary action.

## 5.4 Disclosures that are not covered by this policy

Disclosures of information that are not about Reportable Conduct are not covered by this policy and do not qualify for protection under the Whistleblower Legislation. Disclosures that relate solely to personal work-related grievances are not covered by this policy and information relating to these matters may not be disclosed under this policy.

A matter is a personal work-related grievance if it relates to your employment or former employment with the Sydney Airport Group and has implications for you personally but:

- does not have significant broader implications for the Sydney Airport Group; and
- does not relate to anything done or alleged to be done by you in relation to Reportable Conduct.

Matters that might constitute personal work-related grievances include:

- a decision relating to your engagement or your terms and conditions of engagement, including a decision regarding any transfer or promotion you apply for;
- raising with you matters relating to your performance in your role, or any other matters arising in the ordinary course of your engagement;
- any investigation of alleged misconduct by you, or a decision to take disciplinary action, suspend you or terminate your engagement; or
- an interpersonal conflict between you and another employee.

If you do have a personal work-related grievance that does not involve any Reportable Conduct, but you would like internal assistance to resolve that grievance then please refer to the Resolution of Complaints Policy. Your issue will be dealt with confidentially in accordance with that policy.

## 6. How to raise your concerns about Reportable Conduct

### 6.1 Reporting to an Authorised Recipient

Sydney Airport Group is committed to providing you with a safe, confidential and reliable way of reporting Reportable Conduct. If you are an Eligible Person and make a report of Reportable Conduct to an Authorised Recipient, your report will be a Protected Report and you will have the benefit of the support and the protections described in section 7 of this policy.

Authorised Recipients under this policy are:

- Sydney Airport Group's Whistleblower Hotline, HALO, which is accessible 24 hours a day, 7 days a week at:  
Phone: 1800 342 044 from within Australia  
Email: [safelanding@deloittdigital.com](mailto:safelanding@deloittdigital.com)  
Post: Sydney Airport HALO, Reply Paid 12628, A'Beckett, Street, Melbourne, VIC 8006  
Web: log on to <http://www.safelanding.deloittdigital.com> with username **sydneyairport**, password **safelanding1!**
- General Counsel and Company Secretary and Head of the Whistleblower Team, who can be reached at [general.counsel@syd.com](mailto:general.counsel@syd.com)
- A member of the Executive Leadership Team, whose contact details are available on the Sydney Airport Group intranet
- General Manager Human Resources (Whistleblower Protection Officer), who can be reached at [protection.officer@syd.com.au](mailto:protection.officer@syd.com.au)

## 6.2 Reporting anonymously

You may make a report about Reportable Conduct anonymously if you prefer. However, we encourage you to share your identity wherever possible as this will make it easier for us to fully investigate your report and to provide you with the support and protections described in section 7 of this policy.

If you wish to remain anonymous, we would encourage you to remain in contact with us so that we can ask follow-up questions and provide feedback. If you make a report through the HALO service, then you will be given a unique report reference number which you can use to provide further information and request updates.

## 6.3 Confidentiality

If you make a report about Reportable Conduct then all information received from you, including your identity, if you choose to share it, will be treated confidentially and sensitively. Your identity, and any other information that would be likely to identify you, will only be shared if:

- you consent to the disclosure of your identity;
- the disclosure of details likely to lead to your identification is reasonably necessary for the effective investigation of the matter and all reasonable steps are taken to reduce the risk of your identification;
- the concern is reported to ASIC, APRA, the AFP or a person or body prescribed by regulation or for tax affairs is reported to the Commissioner of Taxation; or
- the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

It is an offence for a person who knows the identity of a person who has made a Protected Report or information likely to lead to their identification and who does not fall into one of the exceptions above to disclose that information. Any person who makes an unauthorised disclosure of the identity of a person who makes a Protected Report under this policy may also face disciplinary action.

## 6.4 Other persons and organisations you may report to

Reports of Reportable Conduct made to the following people will also qualify as Protected Reports:

- any director of a Sydney Airport Group entity;
- Sydney Airport Group's auditor, KMPG, a member of the KMPG audit team conducting an audit of the Sydney Airport Group or a member of Sydney Airport Group's internal audit team;
- the Group Taxation Manager, for tax related reports only; or
- ASIC, APRA or (for tax related affairs) to the Commissioner of Taxation.

You are entitled to make such a report without making a prior report to your manager or to an Authorised Recipient as described in sections 6.1 and 6.2 of this policy. However, we encourage you to report your concerns to your manager or to an Authorised Recipient in the first instance.

## 6.5 Legal advice

Disclosures of information about Reportable Conduct to a legal practitioner for the purpose of obtaining legal advice or representation about the operation or application of the whistleblower protections in the Whistleblower Legislation will also qualify as a Protected Report. Where you are seeking legal advice or representation you should approach an independent legal practitioner and not a member of the Sydney Airport Group legal team, who cannot provide you with advice or representation in relation to your rights under the Whistleblower Legislation.

This section does not prevent you from making a disclosure of Reportable Conduct to the General Counsel and Head of the Whistleblower Team.

## 6.6 Public interest and emergency disclosures

In limited circumstances, the Whistleblower Legislation permits you to make a report about Reportable Conduct to a member of the Federal Parliament or a State Parliament or to a journalist and for that report to qualify as a Protected Report. You can only make a report through these channels if you make a public interest or emergency disclosure, as described in the table below:

Public interest disclosure	Emergency disclosure
A previous report has been made to ASIC or APRA	
90 days has passed since making the report	(No wait period)
You have reasonable grounds to believe that...	
...making a further disclosure of the information would be in the public interest	...the information concerns a substantial and imminent danger to the health or safety of one or more persons to the natural environment
You give the body to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that you intend to make an emergency disclosure	
You then make a disclosure to a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory	

Public interest disclosure	Emergency disclosure
The extent of the information disclosed is no greater than is necessary to inform the recipient of the...	
...misconduct or improper state of affairs or circumstances	...substantial and imminent danger

If any of these conditions is not met, your report will not be a Protected Report and you may incur civil or criminal liability for disclosing the information in your report. We strongly suggest you obtain independent legal advice to ensure that you understand these conditions if you are considering making a public interest disclosure or emergency disclosure.

## 7. Support and protection for reporters

### Whistleblower Team

Sydney Airport Group has appointed the following people as members of the Whistleblower Team:

- Head of the Whistleblower Team - General Counsel & Company Secretary;
- Whistleblower Team members:
  - Manager Corporate Governance
  - Head of Finance Transformation & Strategy
- Whistleblower Protection Officer - General Manager, Human Resources:

The role of the Whistleblower Protection Officer is to:

- support you to maintain confidentiality and anonymity, where relevant, in accordance with this policy;
- assist you with developing strategies for minimising and managing the impact that making the report and its investigation have on you;
- seek to protect you from detriment (as described in section 7.1) if you make a report under this policy, including, where possible, by making a detailed assessment of the risk of detriment to you once your report has been made; and
- investigate any concern that you may have suffered detriment as a result of making your report, or that your report has not been dealt with in accordance with this policy.

You may contact the Whistleblower Protection Officer at any time for any of the purposes described above. If you make a report of Reportable Conduct to an Authorised Recipient described in section 6.1, the Authorised Recipient will inform the Whistleblower Team of your disclosure and, if you consent, your identity.

### 7.1 Protection from detriment

It is unlawful for a person to cause or threaten to cause you detriment because they believe or suspect that you have made, or could make, a Protected Report. Detriment includes:

- physical or psychological harm or injury;
- dismissal or altering your position or employment duties to your disadvantage;

- unlawful discrimination;
- bullying, harassment or intimidation; or
- damage to your property, reputation, business or financial situation.

Not all actions will constitute detrimental conduct. Examples of such non-detrimental conduct include administrative action that is reasonable for the purpose of protecting you from detriment (e.g., moving you out of your immediate work area to another office to protect you from detriment) and managing unsatisfactory work performance.

We will take disciplinary action, which may include dismissal, against any person who causes or threatens to cause detriment to you because they believe or suspect that you or anyone else has made, or could make, a Protected Report. You may also be entitled to seek compensation from a person who causes you detriment if you suffer loss, damage or injury as a result of that detriment.

If you believe you have suffered or may suffer detriment because another person believes or suspects that you have made, or could make, a Protected Report, you should inform the Whistleblower Protection Officer.

## **7.2 Protection from liability for making report**

If you are an Eligible Person and you make a report about Reportable Conduct that qualifies as a Protected Report then the Whistleblower Legislation protects you from the following forms of liability:

- civil liability (e.g. any legal action against the whistleblower for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (e.g. attempted prosecution of the whistleblower for unlawfully releasing information, or other use of the disclosure against the whistleblower in a prosecution (other than for making a false disclosure)); and
- administrative liability (e.g. disciplinary action for making the disclosure).

The protections in the Whistleblower Legislation do not give immunity for any misconduct that you may have engaged in that is revealed by a report that you make. In some circumstances, the fact that you have made a report may be a mitigating factor in assessing any penalties or other sanctions that might be imposed against you for such misconduct. However, Sydney Airport Group cannot give any assurance that your report can or will be taken into consideration in any such assessment and suggests that you seek independent legal advice if you are considering making a disclosure in these circumstances.

## **8. How your report may be investigated**

### **8.1 Assessment of report**

Once you have made a report, it will be assessed by the Whistleblower Team to determine whether the report is a Protected Report under this policy and whether a formal investigation is required.

An appropriate person within or external to Sydney Airport Group will investigate the Protected Report depending on the subject matter involved and to avoid any conflicts of interest.

### **8.2 Investigation of matters disclosed in report**

If it is determined to investigate the matter, the investigator will:

- contact you as soon as practicable to establish a process for communicating about the matters disclosed in your report, unless you have chosen to remain anonymous;
- conduct a fair, independent, thorough and confidential investigation without bias into the matters disclosed in your report, which will generally involve making enquiries and collecting evidence for the purpose of assessing whether those matters can be substantiated;
- report to the Audit and Risk Committee on the findings of any investigation and recommended action to be taken as a result, which may include making reports to the police or other regulatory authorities;
- where appropriate, keep you informed of the progress of the investigation and notify you of the outcome of the investigation, which may be that the matters in your report have been fully or partly substantiated, are not able to be substantiated or have been disproved. However, you will not be given a copy of the investigation report.

### **8.3 Fair treatment of employees mentioned in a disclosure**

Any Sydney Airport Group employee who is the subject of, or mentioned in, a Protected Report will be:

- informed about the matter in accordance with the principles of natural justice and procedural fairness;
- given a reasonable opportunity to respond to any allegations if any investigation is conducted; and
- where appropriate, informed of the outcome of the investigation (but will not be given a copy of the investigation report).

Where an investigation does not substantiate a disclosure made in a Protected Report, the fact that an investigation has been carried out, the results of the investigation, and the identity of any person the subject of the report will remain confidential, unless the subject of the report requests otherwise.

## **9. Publicising the policy**

This policy will be made available:

- on our website;
- to all current employees of the Sydney Airport Group via the intranet; and
- to all new employees as part of their induction process.

## **10. Training**

Sydney Airport Group will provide training to employees in respect of their rights and obligations under this policy and will provide training to senior managers and others who may receive disclosures made under this policy on how to handle those disclosures.

## **11. Monitoring and review of the policy**

This policy and related procedures will be reviewed periodically by the Board of Sydney Airport Limited to ensure that whistleblower reports are being appropriately recorded, investigated and responded to and to consider whether any changes are required to the policy or associated procedures.