

# Sydney Airport

## Whistleblower Policy

### Policy

---

The aim of Sydney Airport's Whistleblower Policy is to make an **Eligible Person** feel confident about raising concerns about actual, suspected or anticipated wrongdoing in good faith, and in a way that offers protection from reprisal or disadvantage.

An **Eligible Person** under this policy includes:

- employees
- directors
- contractors, consultants, suppliers, service providers and other non-employees
- former employees

### Reporting Misconduct

---

Employees are encouraged to first use normal business channels for issues relating to their personal-circumstances or where business procedures exist for reporting potential or actual misconduct, except in instances where a whistleblower believes they may suffer personal disadvantage for making the report.

Sydney Airport has several channels for making a report if a person becomes aware of any issue or behaviour that is considered Reportable Conduct:

- Sydney Airport's General Counsel who can be contacted on +61 2 9667 6111
- Sydney Airport's Whistleblower Hotline, HALO (a 24 hour, externally managed hotline, with the option of anonymity)

### How to access HALO

---

<b>Phone</b>	Call from within Australia 24 hours, 7 days a week on 1800 342 044
<b>Internet</b>	Log onto <a href="http://www.safelanding.deloittedigital.com">www.safelanding.deloittedigital.com</a> and enter the following details: <b>Username:</b> sydneyairport <b>Password:</b> safelanding1!
<b>Email</b>	<a href="mailto:safelanding@deloittedigital.com">safelanding@deloittedigital.com</a>
<b>Post</b>	Send a letter to: Sydney Airport, Reply Paid 12628, A'Beckett Street, Melbourne, VIC 8006

Whistleblower reports should provide as much information as possible about the event including:

- date, time, location, name of person(s) involved including possible witnesses
- any evidence of the event (e.g. documents, emails)
- steps already taken to report the matter elsewhere or attempts made to resolve the concern

All reports must be made with a genuine and reasonable belief regarding the Reportable Conduct.

### Examples of Reportable Conduct include;

---

- Corrupt, dishonest or unethical conduct
- fraudulent or other illegal activity
- conflicts of interest
- breaches of privacy and confidentiality
- a substantial mismanagement of resources
- conduct involving substantial risk to health, safety or the environment
- human rights and modern slavery issues including bullying, harassment and/or discrimination
- other conduct which;
  - potentially breaches a law, regulation or an obligation under a contract
  - is contrary to Sydney Airport's policies or procedures; or;
  - has the potential to damage Sydney Airport's reputation.

### Whistleblower Investigations

---

All reports received will be considered in good faith and, where appropriate, investigated in an objective and fair manner. The investigation will be assigned to a suitable investigation officer who will be responsible for conducting the investigation in a timely manner whilst keeping the whistleblower informed on the investigation's progress.

## Whistleblower Protection and Support

---

Sydney Airport is committed to protecting employees who report wrongdoing in good faith under this policy from disadvantage and ensure they are treated fairly:

- the identify and information received from whistleblowers will be held in the strictest confidence;
- the identity of a whistleblower and any information contained in their report will be kept confidential unless they consent in writing to the disclosure of their information, disclosure is required by law, it is necessary or appropriate for the information to be disclosed to a law enforcement agency, it is necessary to protect or enforce Sydney Airport's legal rights or interests, it is necessary to prevent or lessen a serious threat to a person's health and safety or it is necessary to defend any claims;
- Sydney Airport has nominated its General Counsel as its Whistleblower Protection Officer (WPO), who will be responsible for protecting whistleblowers from disadvantage; and
- an employee who is subjected to detrimental treatment as result of making a report under this policy should inform the General Counsel immediately who may initiate remediation or take other actions as appropriate.

Whilst the same level of practical support cannot be provided to external whistleblowers, Sydney Airport will look to provide support to the extent possible.

## Reporting and Governance

---

- At the end of the investigation, a findings report will be prepared, and if necessary a response will be recommended where improper conduct has been substantiated
- the Audit and Risk Committee will receive copies of all whistleblower reports, in a way that maintains confidentiality as outlined in this policy