



## **Whistleblower Policy**

### **Objective**

The SAPL Directors are committed to fostering a culture of corporate compliance, ethical behaviour and good corporate governance. This policy is established to encourage reporting of instances of unethical, unlawful or undesirable conduct and providing protection for whistleblowers acting in good faith.

### **Application**

This policy applies to all SAPL directors and employees, contractors, customers and suppliers. A person reporting unacceptable conduct is referred to as a whistleblower.

Unacceptable conduct covered by this policy includes:

- Corruption, fraud or other illegal activity;
- Gross mismanagement or waste of company resources or other actions that cause financial loss to SAPL;
- A serious breach of Sumitomo policies or procedures, actions that may damage its reputation or be otherwise detrimental to SAPL's interests;
- Unsafe behaviour that places the safety or health of employees, customers, suppliers or the public at risk;
- Actions that may damage the environment;
- Bullying and harassment;
- Any other unethical conduct.

A whistleblower must act in good faith and have reasonable grounds for suspecting that unacceptable conduct has occurred.

Incidents may be reported anonymously. Where the whistleblower chooses to be identified, SAPL will take all reasonable measures to ensure that person's identity is protected from disclosure.

SAPL will investigate all incidents thoroughly and apply the principles of natural justice. The investigation will be independent and will not be carried out by or on behalf of anyone who is the subject of or involved in the notification. We will advise the whistleblower of the outcome of the investigation.

SAPL will not tolerate any reprisals, discrimination, harassment, intimidation or victimisation against any person who reports unacceptable conduct, either directly or indirectly. Any such retaliatory action will be treated as serious misconduct and will be dealt with in accordance with SAPL's disciplinary procedures.

The Managing Director is accountable to the Board in relation to compliance with this Policy. This Policy will be reviewed every 2 years.

This policy has been approved by the Board of Directors and is effective 1 April, 2011



Kazuyuki Takahashi  
Managing Director