



Whistleblower System

About the Sumitomo Whistleblower System

In April 2011 Sumitomo Australia introduced a Whistleblower Policy and procedures to improve corporate governance by facilitating the reporting of instances of unethical, unlawful or undesirable conduct and providing protection for whistleblowers acting in good faith.

The whistleblower system is open to all SAPL directors and employees, contractors, customers and suppliers. Examples of unacceptable conduct policy include:

- 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.

How to Report Misconduct

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

Reports can be made internally to:

Disclosures of improper conduct or detrimental action may be made internally to the following:

- SAPL Disclosure Officer. (Phil Smith, Manager - Governance, Compliance and Audit has been appointed to this role);
- Any SAPL Director;
- Manager, Human Resources;
- SAPL General Counsel.



SAPL has also appointed STOPline Pty Ltd, an external, independent specialist service provider to receive disclosures of improper conduct. This allows incidents to 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.

Disclosures to STOPline can be made:

- By phone,
 - Within Australia **1300 30 45 50**
 - From overseas via **61 3 9811 3275** (reverse charges). This number is answered as if a local call. These calls are free of charges.
 - Personal response by interviewers is available on business days between 0800 – 2000 hours AEST.
 - Calls outside these hours will go to voicemail.
- Via email to sumitomoaustralia@stoline.com.au
- In writing.

Written disclosures can be directed confidentially to:

Sumitomo Australia Pty Ltd
c/o The STOPline
Locked Bag 8
HAWTHORN VIC 3122

Disclosures to STOPline are normally reported to the SAPL Disclosure Officer within 24 hours.

Investigation of Misconduct

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.