

Whistleblower Policy

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Approved by	Fraser's Property Australia Pty Limited Board

Our Commitment	1
1. Terminology	2
2. Purpose and key concepts	2
3. Who may make a report under this Policy	3
4. Matters that should be reported	3
5. How to make a report	4
6. Confidentiality and Privacy	6
7. Investigation	7
8. Protection and Support for Whistleblowers	9
9. Fair Treatment of Persons Implicated	10
10. Accessibility and Training	10
11. Review of this Policy	11
Attachment 1	12
Attachment 2	13

Our Commitment

Fraser's Property Australia Pty Ltd and its related bodies corporate ("FPA") has a long standing commitment to conducting its business with honesty and integrity. FPA is committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

FPA recognises the importance of having a transparent Whistleblower Policy which encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving FPA's businesses and will endeavour to ensure that those persons who make a report shall do so without fear of intimidation, disadvantage or reprisal.

This Policy details the framework for receiving, investigating and addressing allegations of criminal, dishonest or unethical behaviour where that behaviour concerns the activities of FPA or current and former directors, officers, agents, employees and contractors of FPA.

Whistleblower matters generally do not include the following types of disclosures:

- (a) operational matters which do not raise the above concerns and which should be dealt with at the

Business Unit level; or

- (b) human resource or other issues for which there is in place resolution procedures set up by FPA, including any personal work-related grievance of the discloser (see section 6).

1. Terminology

ASIC means Australian Securities and Investments Commission.

Corporations Act means *Corporations Act 2001* (Cth).

Disclosure Register means a record of all reports of Reportable Matters received, the investigation process undertaken and any actions taken to resolve the matter.

Independent Whistleblower Service means FPA's external independent whistleblowing service provider. This service is published on FPA's website and intranet.

Policy means this document, being the Whistleblower Policy of FPA.

Reportable Matter has the meaning given in **section 4**

Whistleblower means a person who makes a report in accordance with this Policy.

Whistleblower Investigations Officer (WIO) means a designated FPA representative tasked with the responsibility of conducting preliminary investigations into reports received from a Whistleblower. The role of the WIO is to investigate the substance of the complaint to determine whether there is evidence in support of the matters raised, or alternatively, to refute the report made. A list of these people is published on FPA's website and intranet.

Whistleblower Protection Officer (WPO) means a designated FPA representative tasked with the responsibility of protecting and safeguarding the interests of Whistleblowers within the meaning of this Policy. The WPO will have access to independent financial, legal and operational advisers as required.

2. Purpose and key concepts

Objectives

The objectives of this Policy are to:

- a) provide Whistleblowers with a clear framework within which to report issues of concern;
- b) ensure any reports of Reportable Matter are dealt with appropriately;
- c) provide Whistleblowers with a clear understanding of how reports will be handled;
- d) protect Whistleblowers from victimisation and retaliation;
- e) support Whistleblowers throughout the reporting process; and
- f) afford natural justice and procedural fairness to anyone who is implicated in a report of Reportable Matter.

Key concepts

There are some key concepts under this Policy.

- A Whistleblower is a person who makes a report under this Policy.
- The Whistleblower makes the report in the manner explained in section 7. There are several ways a report may be made, including by making a report to:
 - the WPOs – who are listed in Section 5 of this Policy and on www.frasersproperty.com.au; or
 - the Independent Whistleblower Service.
- The WPO's role is to protect the interests and welfare of the Whistleblower.

- The WIO will carry out or supervise investigations of reports made under this Policy.

All of these concepts are explained in more detail in this Policy.

3. Who may make a report under this Policy

Reports may be made under this Policy by any previous or current:

- employee, director, or officer of FPA;
- supplier or contractor (or an employee of a supplier or contractor), of FPA or that acts on behalf of FPA;
- an associate (eg. a director of a related body corporate); and
- a spouse, relative or dependant of any of the above individuals.

A Whistleblower is any of the above individuals who makes a report in accordance with this Policy.

A person who makes a report under this Policy may be eligible for protection as a whistleblower under the *Corporations Act 2001* (Cth) and the Tax Administration Act 1953 in certain circumstances. More information on this is in [Attachment 2](#).

4. Matters that should be reported

A **Reportable Matter** means any information about FPA (or an officer or employee of FPA) that the Whistleblower has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances in relation to FPA or a related body corporate of FPA.

This includes where the Discloser has reasonable grounds to suspect that the information indicates FPA or any of its employees or officers has or may have engaged in conduct that:

- constitutes an offence against, or a contravention of the *Corporations Act 2001* (Cth), the *Australian Securities and Investments Commission Act 2001* (Cth); any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- represents a danger to the public or the financial system (even if it does not involve a contravention of a particular law);
- is a serious breach of any internal policy or code of FPA;
- is illegal (such as theft, use of illicit drugs, violence or criminal damage against property);
- constitutes dishonest, fraudulent or corrupt activity, including bribery and tax evasion;
- constitutes a danger to health and safety at FPA; and
- the deliberate concealment of any of the above matters.

Personal Work Related Grievances of current or former employees are not covered under this Policy, and should be reported to your line manager or should be raised through your manager or HR representative. A disclosure that relates solely to Personal Work Related Grievances does not qualify for protection under the Corporations Act.

A “Personal Work Related Grievance” means a grievance about any matter in relation to the discloser’s employment, or former employment, having (or tending to have) implications for the discloser personally. This includes:

- i. an interpersonal conflict between the discloser and another employee;
- ii. a decision relating to the engagement, transfer or promotion of the discloser;

- iii. a decision relating to the terms and conditions of engagement of the discloser; and
- iv. a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

However, it does not include:

- any conduct that would be considered victimisation of an individual because they have made, may have made, or propose to make a report under this Policy;
- a matter that would have significant implications for FPA;
- a breach of employment or other laws punishable by imprisonment for a period of 12 months or more;
- conduct that represents a danger to the public;
- information that suggests misconduct beyond the discloser's personal circumstances;
- information about misconduct that includes or is accompanied by a personal work-related grievance.

Reports that are not about a Reportable Matter will not qualify for protection under the Corporations Act or the Taxation Administration Act (although those reports may be protected under other legislation such as the *Fair Work Act 2009* (Cth)).

Reasonable Grounds: A Discloser must have reasonable grounds for a report made under this Policy. A mere allegation with no supporting information is unlikely to be considered as having reasonable grounds. However a Discloser does not need to prove their allegations. A Discloser will still qualify for protection under this Policy even if their disclosure turns out to be incorrect.

False or Vexatious Reports

The reporting of false information is taken very seriously by FPA. Individuals who deliberately or knowingly report false information will not be able to access the protections available under this Policy for Whistleblowers, or any legal protections, and individuals who are employees, officers or contractors of FPA may be subject to disciplinary action.

5. How to make a report

The following channels are available for reporting Reportable Matters. If a Whistleblower has any questions or wishes to obtain additional information before making a report, he or she should contact a Whistleblower Protection Officer or obtain independent legal advice.

Reporting by Internal Disclosers/Whistleblowers

Employees should first report any matters of concern to a Whistleblower Protection Officer. Where this is not appropriate, where the employee does not feel comfortable making an internal report, or where an employee has made an internal report but no action has been taken within a reasonable time, a report can be made using the reporting channels outlined below.

Report to a Whistleblower Protection Officer

FPA's WPOs are:

- The Company Secretary (currently Maria Vesic contactable on 02 9767 2042);
- The Company Secretarial Administrator (currently Janis Wood contactable on 02 9767 2178);
- The Human Resources Manager (currently Kylie Izzillo contactable on 02 9767 2194); and
- The Human Resources Business Partner (currently Rebecca Stuart contactable on 02 9767 2361).

The WPOs may be contacted:

- (a) via their individual phone numbers above; or
- (b) in person.

When contacting a WPO, the Whistleblower should inform the WPO that they wish to make a report under this Policy, so that the WPO can make appropriate arrangements in relation to confidentiality.

Independent Whistleblower Service

Any Whistleblower may use FPA's Independent Whistleblower Service, which enables reports to be made anonymously and confidentially.

The Independent Whistleblower Service reporting options include:

Communication method	Contact details	Number	KPMG Office Location
FairCall telephone 	Australia	1800 500 965	Australia & South Africa*
FairCall web 	https://www.kpmgfaircall.kpmg.com.au/frasers		
FairCall post 	The <i>FairCall</i> Manager KPMG Forensic PO Box H67 Australia Square Sydney NSW 1213		
FairCall fax number 	+61 2 9335 7466		

* Outside of business hours, a Whistleblower may elect to have their call answered by KPMG South Africa, or they may leave a voicemail with KPMG Australia for a call back service.

Report to an Eligible Recipient

If a Whistleblower is unable to use any of the above channels for reporting, a report can be made to an Eligible Recipient within FPA. Eligible Recipients in relation to FPA are:

- (i) officers, directors and senior managers;
- (ii) internal or external auditors, or a member of an audit team conducting an audit.

Reports to an Eligible Recipient:

- must be made in person or by telephone; and
- the Whistleblower must first inform the Eligible Recipient that they wish to make a report under this Policy, so that the Eligible Recipient can make appropriate arrangements in relation to confidentiality.

An Eligible Recipient may direct the Whistleblower to make the report to a WPO or to the Independent Whistleblower Service, if they consider it appropriate in the circumstances.

Other External Reporting Channels

FPA encourages employees and other Whistleblowers to make a report to FPA in the first instance, so that it can identify and address wrongdoing as early as possible. However, the Whistleblower may make a report about a Reportable Matter to an external party as set out in [Attachment 2](#).

6. Confidentiality and Privacy

A Whistleblower may make an anonymous report. Whistleblowers are encouraged (but not required) to disclose their identity when making a report. Providing their identity will assist in:

- monitoring their wellness and protections against Detriment (see section 8); and
- investigating their report and obtaining further information from them as is necessary to complete the investigation.

If a report is anonymous (i.e. the Whistleblower has not consented to the disclosure of their identity), the report may still be referred for investigation, but the investigator will be required to take all reasonable steps to reduce the risk that the Whistleblower will be identified as a result of the investigation. Further information on legal protections is set out in the [Attachment 2](#).

Disclosure of information

Information about a Whistleblower's identity may only be disclosed without consent in the following circumstances:

- i. Where the information is disclosed to ASIC, APRA, the Australian Federal Police or to a person or body prescribed by regulations; or
- ii. Where the information is disclosed to a legal practitioner for the purpose of obtaining legal advice in relation to the operation of applicable whistleblowing protection laws.

Information that may be likely to lead to the identification of the Whistleblower may be disclosed without consent if:

- a) The information does not include the Whistleblower's identity;
- b) all reasonable steps have been taken to reduce the risk that the Whistleblower will be identified from the information; and
- c) It is reasonably necessary for investigating the issues raised in the report.

It is illegal for a person to identify a Discloser or disclose information that is likely to lead to the identification of a Discloser, apart from the exceptional circumstances described above.

Reasonable steps that FPA may take to reduce the risk that a Whistleblower will be identified include:

- a) all personal information or reference to the Whistleblower witnessing an event will be redacted;
- b) the Whistleblower will be referred to in a gender-neutral context;
- c) where possible, the Whistleblower will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them;
- d) disclosures will be handled and investigated by qualified staff;
- e) all paper and electronic documents and other materials relating to disclosures will be stored securely;

- f) access to all information relating to a report will be limited to those directly involved in managing and investigating the report;
- g) only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a Whistleblower's identity (subject to the Whistleblower's consent) or information that is likely to lead to the identification of the Whistleblower;
- h) communications and documents relating to the investigation of a report will not be sent to an email address or to a printer that can be accessed by other staff; and
- i) each person who is involved in handling and investigating a report will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a Whistleblower's identity may be a criminal offence.

Whistleblowers should be aware that, in practice, people may be able to guess a Whistleblower's identity if:

- the Whistleblower has previously mentioned to other people that they are considering making a disclosure;
- the Whistleblower is one of a very small number of people with access to the information; or
- the disclosure relates to information that a Whistleblower has previously been told privately and in confidence.

If a Whistleblower becomes aware that there has been a breach of confidentiality in relation to a report made in accordance with this Policy, they should contact a Whistleblower Protection Officer.

7. Investigation

Assessment of Report

The WPOs will conduct an initial assessment of a report made under this Policy to assess whether it concerns a Reportable Matter.

If any of the WPOs is implicated in the report, that WPO must not have any involvement in the initial assessment. If all WPOs are implicated in a report, the matter may be referred directly to the Chair of the Board.

Investigation of Report

The WIO will determine whether sufficient information exists to allow the report(s) to be investigated, whether an investigation is required, and whether the matter may be investigated or confirmed in other ways. The WIO will also determine the appropriate investigation process, including:

- the nature and scope of the investigation;
- who will conduct the investigation and whether that person should be external to FPA;
- the nature of any technical, financial or legal advice that may be required; and
- a timeframe for the investigation (having regard to the allocated level of risk).

An investigation may not be possible if the Whistleblower cannot be contacted or further details cannot be obtained (for example, if a report is made anonymously and no contact details are provided).

The WIO will ensure that the investigation process is objective, fair and independent.

If the Whistleblower can be contacted, they will be provided with regular feedback and informed on a continuing basis as to the nature and progress of the investigation, unless the WIO deems it inappropriate

to do so for any reason. The frequency and timeframe of these updates may vary depending on the nature of the report.

FPA may be required to refer a report to the Australian Federal Police or other agency (e.g. ASIC). In such circumstances, FPA may not be able to keep a Whistleblower informed on the progress of an investigation.

Investigation findings

FPA will apply principles of procedural fairness and natural justice to the conduct of any investigation and resultant findings arising under this Policy.

An employee who is the subject of a Protected Disclosure will be advised as and when required and prior to any actions being taken and will be given access to FPA's support services.

The person leading any investigation will report their findings to the WIO. The method of documenting and reporting the findings of an investigation will depend on the nature of the report. Where a formal investigation is conducted, the investigator will provide a report to the WIO documenting the investigator's findings. This report must be kept strictly confidential and disclosed only to those who have a need to know the information. Upon review of the findings of an investigation, the WIO will make recommendations to the FPA Finance Committee and the General Manager, People & Culture (where the latter is not acting in the capacity of a WIO) regarding the actions (if any) to be taken in response to the findings.

The FPA Finance Committee will consider the recommendations made to it, as well as the findings of the investigation, and will determine what actions (if any) will be taken in response to the findings. If appropriate, and subject to any applicable confidentiality, privacy or legal constraints, the WPO may notify the Whistleblower of the conclusion of the investigation and the action taken. See Attachment 1.

Record keeping and accountability

FPA will establish and maintain a Disclosure Register, which will be maintained and updated by the WPOs and the WIO.

The WPOs will submit a quarterly summary report to the FPA Finance Committee, which provides statistics of:

- i. the number of reports received, per quarter;
- ii. for each report, the type of misconduct alleged, the level of seniority of the alleged wrongdoer and the level of perceived risk;
- iii. for each report, the time taken to investigate it;
- iv. the conclusion of each investigation (upholding or dismissing the report) and the nature of the action taken (such as disciplinary action).

The WIO shall periodically review the Disclosure Register to ensure that proper processes are being followed.

FPA shall review this Policy, and its whistleblowing processes, on a periodic basis to ensure that it is operating effectively, and to rectify any issues identified.

8. Protection and Support for Whistleblowers

It is a breach of this Policy to subject a Whistleblower to any Detriment because they have made, or propose to make, a report under this Policy. It is also a breach of this Policy to make a threat to cause Detriment to a Whistleblower (or another person) in relation to a report.

“**Detriment**” includes (without limitation):

- (i) dismissal;
- (ii) injury of an employee in his or her employment;
- (iii) alteration of an employee's position or duties to his or her disadvantage;
- (iv) discrimination between an employee and other employees;
- (v) harassment or intimidation;
- (vi) harm or injury (including psychological harm);
- (vii) damage to a person's property; and
- (viii) reputational, financial or any other damage to a person.

Detriment does not include administrative action that is reasonable to protect a Whistleblower from Detriment (for example a temporary transfer), or reasonable management action in relation to managing an employee's work performance, if the action is in line with FPA's performance management framework.

FPA is committed to ensuring that any person who reports a Reportable Matter, acts as a witness or participates in any way with respect to a report of Reportable Matter is not victimised. Victimisation is offensive to both FPA's standards of conduct and its culture values and it is illegal. FPA will thoroughly investigate reports of victimisation. If proven, those who have victimised a person may be subject to management action (including disciplinary action or dismissal) and potentially criminal liability under the Corporations Act.

The WIO will perform a risk of Detriment assessment to identify the risk of Detriment against a Whistleblower and other persons (e.g. other staff who might be suspected to have made a disclosure), which will commence as soon as possible after receiving a report.

If there is a risk that a Whistleblower may be subject to Detriment, FPA may implement flexible arrangements to prevent this, including allowing the Whistleblower to perform their duties from another location, reassigning the Whistleblower to another role at the same level, or reassigning or relocating other staff involved in or implicated in the report;

If a Whistleblower believes they have suffered or may suffer Detriment because they have made a report under this Policy, or if any person has threatened to cause Detriment to them or another person in connection with a report, they should immediately report the matter to a WPO.

Civil, Criminal and Administrative Immunity

A Whistleblower will have immunity from civil, criminal and administrative liability in relation to a report of a Reportable Matter made in accordance with this Policy. However, these immunities do not apply to any misconduct of the Whistleblower that is revealed in a report.

Further information on legal protections and remedies is set out in the [Attachment 2](#).

Support for Whistleblowers

Additional support available for Disclosers includes:

- connecting the Whistleblower with access to the Employee Assistance Program (EAP)
- connecting the Whistleblower with third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636)

Use of these support services by a Whistleblower may require the Whistleblower to consent to disclosure of their identity or information that is likely to lead to the discovery of their identity.

9. Fair Treatment of individuals mentioned in a disclosure

Any reports that mention or implicate an employee or officer of FPA must be kept confidential, even if the Whistleblower has consented to the disclosure of their identity, and should only be disclosed to those persons who have a need to know the information for the proper performance of their functions under this Policy, or for the proper investigation of the report.

No action will be taken against employees or officers who are implicated in a report under this Policy until an investigation has determined whether any allegations against them are substantiated. However, an employee or officer who is implicated may be temporarily stood down on full pay whilst an investigation is in process, or may be temporarily transferred to another office, department or workplace, if appropriate in the circumstances, while the investigation is continuing. If the investigation determines that the allegations are not substantiated, the employee or officer must be immediately reinstated to full duties.

An employee or officer who is implicated in a disclosure has a right to be informed of the allegations against them, and must be given an opportunity to respond to those allegations and provide additional information, if relevant, in the course of an investigation into those allegations (subject to the Discloser's right to anonymity). An employee or officer who is implicated in a report will be informed of the outcome of any investigation.

Support available for persons implicated in a report under this Policy includes:

- connecting the person with access to the Employee Assistance Program (EAP)
- connecting the person with third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636).

10. Accessibility and Training

This Policy will be available on FPA's external website and intranet and distributed to all employees via "Workplace" and email.

FPA will arrange for managers and employees to receive training on improper practices that may arise from their day-to-day work given the nature of FPA's operations and be given practical advice on how to deal with such situations.

FPA will endeavour to ensure that all employees are aware of and understand their obligations under the Policy.

All new employees will receive training on this policy as part of the employee's induction training. Regular training on this Policy will also be included as part of FPA's internal training program.

All employees appointed as WPOs or WIOs will receive training on their roles, obligations and responsibilities under this Policy prior to any such appointment and at least annually thereafter.

11. Review of this Policy

The WPOs will report to the Board of FPA on a quarterly basis or as necessary regarding the effectiveness of this Policy, and FPA's whistleblowing processes. All such reports shall be de-identified and shall ensure confidentiality of Disclosers.

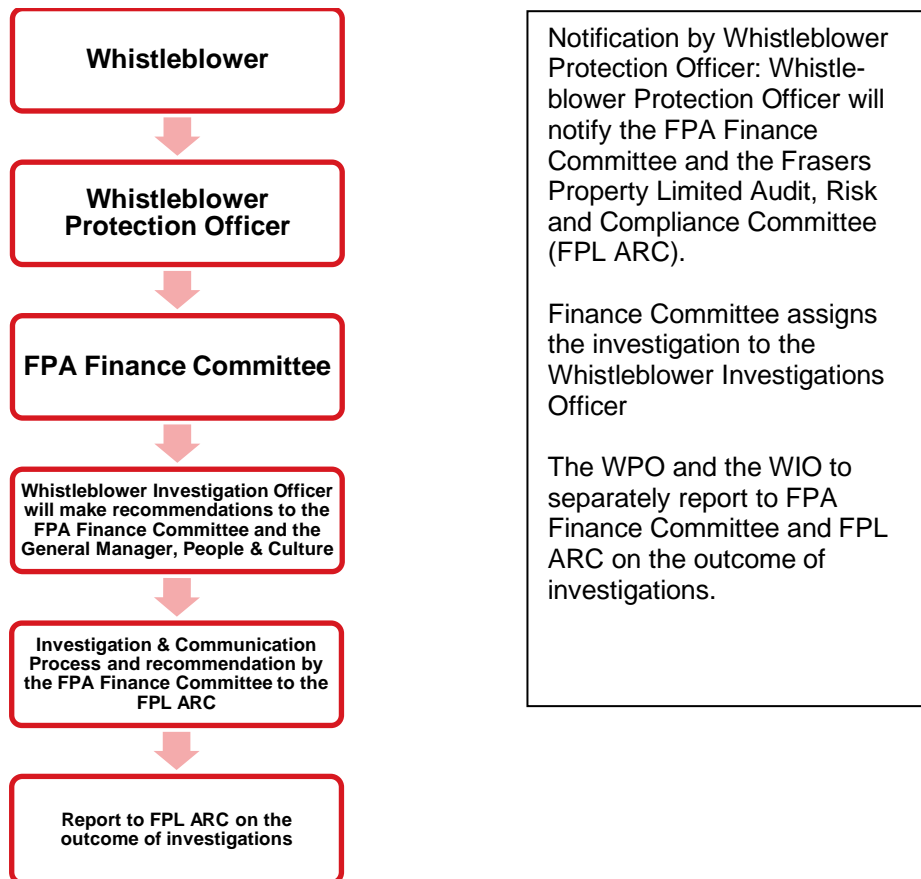
If a report under this Policy relates to serious misconduct or involve a serious risk to FPA, a WPO may immediately notify the Board.

The Company Secretary must keep this Policy under review to ensure it remains adequate, and at least annually, must formally review it to ensure it remains up to date and appropriate.

Attachment 1

FPA

WHISTLEBLOWER POLICY CHANNEL OF COMMUNICATION



The WIO will make recommendations to the FPA Finance Committee and the General Manager, people & Culture (where the latter is not acting in the capacity of a WIO)”

Attachment 2

Protections for Whistleblowers under the Corporations Act

- A Discloser may qualify for protection as a whistleblower under the *Corporations Act 2001* (Cth) if they are an 'eligible whistleblower' in relation to FPA, and:
- They have made a disclosure of information relating to a 'disclosable matter' directly to an 'eligible recipient', or to ASIC, the Australian Prudential Regulation Authority (APRA) or another Commonwealth body prescribed by regulation;
- They have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act (even in the event that the legal practitioner concludes that a disclosure does not relate to a 'disclosable matter'); or
- They have made an 'emergency disclosure' or a 'public interest disclosure'.

Public interest disclosures and emergency disclosures

Disclosures can be made to a journalist or a parliamentarian under certain circumstances and qualify for protection under the Corporations Act. These kinds of disclosures must meet several legal requirements, as described below, in order for the discloser to be subject to the whistleblower protections under the law. A discloser should obtain independent legal advice to ensure that they understand the criteria for making an emergency disclosure or a public interest disclosure that qualifies for protection.

An **Emergency Disclosure** is the disclosure of information to a journalist or parliamentarian, where:

- a) the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- c) before making the emergency disclosure, the discloser has given written notice to the body to which the previous disclosure was made that:
 - (i) includes sufficient information to identify the previous disclosure; and
 - (ii) states that the discloser intends to make an emergency disclosure; and
- d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

A **Public Interest Disclosure** is the disclosure of information to a journalist or a parliamentarian, where:

- a) at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
- c) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- d) before making the public interest disclosure, the discloser has given written notice to the body to which the previous disclosure was made that:
 - (i) includes sufficient information to identify the previous disclosure; and
 - (ii) states that the discloser intends to make a public interest disclosure.

Legal Protections

The following protections are available to whistleblowers who make a protected disclosure under the Corporations Act or the Taxation Administration Act (whether that disclosure is made internally, or to an external body such as ASIC, APRA, a legal practitioner or is a public interest or an emergency disclosure):

- Protection of the whistleblower's identity, if he or she wishes to remain anonymous;
- Protection from Detriment because of making a protected disclosure;
- The right to claim compensation for loss, damage or injury caused to the Whistleblower because of a protected disclosure and the right to claim other remedies such as an injunction to prevent the Detriment, reinstatement of employment and orders requiring an apology;
- Protection from civil, criminal and administrative liability because of making the protected disclosure.

Anonymous Reports

A report can be made anonymously and still be protected under the Corporations Act. A Whistleblower can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A Whistleblower can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. A Whistleblower who wishes to remain anonymous should maintain ongoing two-way communication with FPA, so that FPA can ask follow up questions or provide feedback. Whistleblowers who wish to remain anonymous are encouraged to use the external hotline reporting system.

Legal Remedies

A Whistleblower that suffers loss, damage or injury because of a protected disclosure may seek compensation and other remedies through the courts. A Whistleblower should seek independent legal advice if they wish to obtain such a remedy. A Whistleblower may also contact regulatory bodies such as ASIC or APRA if they believe that they have suffered Detriment due to making a report about a disclosable matter, or if there has been a breach of confidentiality such as a disclosure of their identity without their consent.