


<b>BU</b>	<b>APPROVED BY / ISSUED DATE</b> July / 2026	  <b>POLICIES &amp; PROCEDURES</b>
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		<b>WWG WHISTLEBLOWER POLICY NZ</b>

### What this topic is about:

Workwear Group (the “**Company**”) is committed to the highest standards of conduct and ethical behaviour in all our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance, and good corporate governance.

The Company encourages the reporting of suspected unethical, illegal, fraudulent, or undesirable conduct involving the Company. The Company provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage, or reprisal.

This policy is available on the Company’s intranet and internet.

### Who is and eligible whistleblower under this policy?

This policy applies to protected disclosures made in New Zealand by:

- an officer, former officer, team member, former team member, contractor, or former contractor of the Company
- an individual, or employee of a person or entity, who supplies goods or services to the Company
- an employee of a person or entity who supplies goods or services to the Company (whether paid or unpaid)
- an associate of the Company (meaning a director or secretary of the Company or of its related bodies corporate, or a person acting in concert with the Company); and
- a relative or dependent of any of the persons listed above.

### What is reportable conduct?

You may make a report under this policy if you have reasonable grounds to suspect any misconduct or improper state of affairs or circumstances (Reportable Conduct). For example (and the following is not an exhaustive list), this might include having reasonable grounds to suspect that a Company director, officer, team member, contractor, supplier, tenderer, or other person who has business dealings with the Company has engaged in conduct which:

- is dishonest, fraudulent, or corrupt, including bribery or other activity in breach of the Wesfarmers Anti-bribery Policy;
- is an illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property, breach of competition and consumer law, breach of privacy law or other breaches of law);
- is unethical or in breach of the Company’s policies (such as dishonestly altering company records or data, or adopting questionable accounting practices);
- is potentially damaging to the Company, a team member or a third party, such as unsafe work practices, environmental damage, health risks or abuse of the Company’s property or resources;
- amounts to an abuse of authority or gross negligence or mismanagement by public officials;
- may cause financial loss to the Company or damage its reputation or be otherwise detrimental to the Company’s interests; or
- involves serious wrongdoing in the Company or by the Company, any criminal offences or any act or omission or course of conduct that constitutes a serious risk to public health or safety or the environment
- involves harassment, discrimination victimisation or bullying, that is systemic or widespread and is not characterised as personal work-related grievance

- involves threats (expressly or impliedly) to take any retaliatory action against another person, where such action is taken against that person because they have made or may make a disclosure that qualifies for protection under this Policy or because they provide voluntary supporting information. Retaliatory action includes any victimisation, bullying, discrimination, or harassment, whether against a team member or another person; or
- involves any other kind of misconduct or an improper state of affairs, or circumstances.

The Company expects that reports made under this policy are made honestly, ethically and on reasonable grounds. Persons making reports under this policy may still qualify for protection under this policy even if their disclosure turns out to be incorrect.

### What is not Reportable Conduct?

Reportable Conduct generally does not include conduct concerning a person’s individual employment or former employment (other than as set out in Reportable Conduct). These matters, known as personal work - related grievances may include:

- an interpersonal conflict at work
- a decision relating to engagement, transfer, or promotion
- a decision relating to terms and conditions of engagement; or
- a decision to suspend or terminate the engagement or to discipline the person

These matters will typically be assessed and, where appropriate, investigated or addressed under the Company’s Respectful Workplaces Policy.

A personal work-related grievance may however amount to Reportable Conduct under this policy, where for example, the grievance is systemic in nature and involves or affects multiple team members or relates to conduct that has been taken against a person because they made a report under this policy

### Who can I make a report to?

The Company has nominated several channels (or eligible recipients) for making a report if you become aware of any issue or behaviour which you consider to be Reportable Conduct:

Method	Details
To Speak Up (independent third-party)	<p>A report may be made via the Speak Up Service: a free external hotline and reporting service independently monitored by Deloitte.</p> <p>Speak Up reporting options are:</p> <ul style="list-style-type: none"> <li>• by phone: 0800 176 386</li> <li>• by email: <a href="mailto:SpeakUp@deloitte.com.au">SpeakUp@deloitte.com.au</a></li> <li>• web-based access: <a href="http://www.SpeakUp.deloitte.com.au">www.SpeakUp.deloitte.com.au</a></li> <li>• by post: Speak Up  Freepost 256853  PO Box 90553  Victoria Street  Auckland 1142  New Zealand</li> </ul> <p>Reports may be made anonymously Any details which may identify you (such as your name or contact details) will only be provided to the Company if you consent to those details being shared with the Company.</p>

Method	Details
To a Protected Disclosure Officer	<p>To ensure appropriate escalation, and timely investigation, we request that reports are made to any one of our Protected Disclosure Officers, listed below:</p> <ul style="list-style-type: none"> <li>• Damian Zahra - Chief People Officer email: <a href="mailto:DZahra.whistleblower@bunnings.com.au">DZahra.whistleblower@bunnings.com.au</a></li> <li>• Judd Young – General Manager of Workplace Relations and Workforce Planning email: <a href="mailto:JYoung.whistleblower@bunnings.com.au">JYoung.whistleblower@bunnings.com.au</a></li> <li>• Workplace Relations Lawyers <a href="mailto:WRLawyers.whistleblower@bunnings.com.au">WRLawyers.whistleblower@bunnings.com.au</a></li> <li>• Michelle Curran – General Manager, Group Risk and Compliance <a href="mailto:MCurran.whistleblower@bunnings.com.au">MCurran.whistleblower@bunnings.com.au</a></li> <li>• Sophie Robinson – Risk and Resilience Manager <a href="mailto:Srobinson2@bunnings.com.au">Srobinson2@bunnings.com.au</a></li> <li>• Laura Gaspert - Head of Group Sourcing Compliance <a href="mailto:Lgaspert@bunnings.com.au">Lgaspert@bunnings.com.au</a></li> <li>• Mark Philips – State Investigations Manager <a href="mailto:MPhillips.whistleblower@bunnings.com.au">MPhillips.whistleblower@bunnings.com.au</a></li> </ul>
By post	Reports may also be posted to c/- Locked Bag 3004, Hawthorn, Victoria, 3122 (marked Private & Confidential and to the attention of one of the Protected Disclosure Officers).

In order to qualify for protection, a report must concern Reportable Conduct and be made by an eligible whistleblower to an eligible recipient identified in this policy, or any other recipient prescribed by law, such as an ‘officer’ or ‘senior manager’ of the company (includes a director, or a senior manager in the company who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the company, or who has the capacity to affect significantly the company’s financial standing), the relevant regulator. Reportable Conduct will not be protected if the disclosing party:

- knows the allegations to be false or acts in bad faith; or
- discloses information protected by legal professional privilege.

### Investigation of Reportable Conduct

The Company will investigate Reportable Conduct reported under this policy as soon as practicable after the matter has been reported. Speak Up, or a Protected Disclosure Officer may, with your consent, appoint a person to assist in the investigation of a report. Where appropriate, the Company will provide feedback to you regarding the investigation’s progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).

Any investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances and in a manner that protects the whistleblower from identification, disadvantage or reprisal, or threats of such conduct.

While the particular investigation process and enquiries adopted will be determined by the nature and substance of the report, in general, as soon as practicable upon receipt of the report, if the report is not anonymous, a Protected Disclosure Officer or delegate will contact you to discuss the investigation process, including who may be contacted and such other matters as are relevant to the investigation.

Where a report is submitted anonymously, the Company may conduct an investigation based on the information provided to it.

## Protection of Whistleblowers

The Company is committed to maintaining confidentiality in respect of matters raised under this policy, and to providing support to those who make a report so they are treated fairly and do not suffer retaliatory action.

### (a) *Protection against retaliatory action*

Retaliatory action includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats injury to a person (including psychological harm, and/or damage to a person's property or reputation, or their business or financial position or other unfavourable treatment connected with making a report.

If you are subjected to retaliatory action as a result of making or intending to make, a report under this policy you should:

- inform a Protected Disclosure Officer, officer of the Company immediately; or
- make a separate report about the threatened or actual retaliatory action in accordance with this policy.

The Company will not tolerate whistleblowers suffering threats of any retaliatory action or actual retaliatory action as a result of making a disclosure or report or because they may make a disclosure or report under this Policy and any such actions taken may result in disciplinary action up to and including termination of employment

Where required, the Company may take such steps as are reasonably necessary to protect a whistleblower against retaliation. For example, as regards a team member this may include adapting their work or role, changing the work location or granting leave pending completion or resolution of an investigation.

### (b) *Protection of your identity and confidentiality*

Subject to compliance with legal requirements, upon receiving a report under this policy, the Company will take reasonable steps to keep your identity confidential and mitigate the risk of disclosure in the course of an investigation and will only share your identity as a whistleblower or information likely to reveal your identity if:

- you consent in writing;
- the person who has acquired knowledge of the protected report reasonably believes that the disclosure of identifying information is essential to the effective investigation of the allegations in the report or to prevent serious risk to public health or safety or the environment or is essential having regards to the principles of natural justice; or
- the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If the Company needs to investigate a report, it may disclose information that could lead to your identification, but it will take reasonable steps to reduce this risk.

Any disclosures of your identity or information likely to reveal your identity will only be made to an employee, advisor or contractor of the Company or related party entities, such as Wesfarmers Limited, who reasonably has a need to investigate, report on, or respond to, the matters raised in your disclosure.

### (c) *Protection of files and records*

All files and records created from an investigation will be retained securely.

Unauthorised release of information to someone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) without your consent as a whistleblower will be a breach of this policy.

Whistleblowers are assured that a release of information in breach of this policy will be regarded as a serious matter and will be dealt with under the Company's disciplinary procedures.

(d) *Support services*

Persons considering making, or who have made disclosures can also seek further advice from Ombudsmen for advice.

The contact details are as follows:

The Ombudsman

PO Box 10152

Wellington 6143

Phone: 0800 802 602

Email: [info@ombudsman.parliament.nz](mailto:info@ombudsman.parliament.nz)

Web: [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz)

### **Fair treatment for employee respondents**

Any employee who is mentioned in a disclosure that qualifies for protection under this policy and/or any relevant whistleblower laws, or to whom such a disclosure relates, (a respondent) will be treated fairly throughout the investigation process which includes, where appropriate, provided with sufficient details of the allegations to provide a response if required including being given a reasonable opportunity to provide their version of events and/or to submit relevant evidence.

The respondent can also seek further advice from Ombudsmen for advice. The contact as above.

### **Duties of team members in relation to Reportable Conduct**

Team members who become aware of actual Reportable Conduct, or suspect on reasonable grounds, potential cases of Reportable Conduct, are expected to make a report under this policy or other applicable policies.

### **Reporting procedures**

Protected Disclosure Officers will report to the Company's and Wesfarmers board on the number and type of whistleblower incident reports annually, to enable Wesfarmers to address any issues at a divisional/business unit and Group level. These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this policy.

The Wesfarmers Audit and Risk Committee will receive copies of all whistleblower reports, and whistleblower reports from Protected Disclosure Officers (as appropriate). In addition, serious and/or material Reportable Conduct will be considered by the Protected Disclosure Officers for immediate referral to the Chairman of the Wesfarmers Audit and Risk Committee.

### **Operation and Amendment of this policy**

This policy:

- operates in addition to the [Wesfarmers Whistleblower Policy](#) and, in the event of any inconsistency with the Wesfarmers Whistleblower policy, the Wesfarmers Whistleblower policy will prevail to the extent of the inconsistency;
- cannot be amended without approval of the board of directors that governs the Company. It will be reviewed from time to time to ensure that it remains effective and meets best practice standards and the needs of the Company.