



# Whistleblower Policy

**Version:** 5.0

**Approval date:** 4/12/2019

**Effective date:** 4/12/2019

## Table of contents

<b>1. POLICY OVERVIEW</b>	<b>4</b>
1.1. POLICY STATEMENT	4
1.2. PURPOSE	4
1.3. SCOPE	4
<b>2. LEGAL AND COMPLIANCE REQUIREMENTS</b>	<b>5</b>
2.1. LEGAL REQUIREMENTS	5
2.2. REVIEW AND UPDATE OF THE POLICY STATEMENT	5
<b>3. OPERATING PRINCIPLES AND GUIDELINES</b>	<b>6</b>
3.1. WHO CAN MAKE A REPORT?	6
3.2. MATTERS THAT SHOULD BE REPORTED	6
3.2.1. Breaches of Legal Obligations	6
3.2.2. Fraudulent, other illegal activity or criminal offences	6
3.2.3. Dishonest, corrupt and unethical conduct	6
3.2.4. Unsafe work practices	6
3.2.5. Other Improper Conduct	6
3.2.6. Any deliberate concealment relating to any Improper Conduct	6
3.3. EXCLUDED MATTERS	7
3.4. MAKING A REPORT	7
3.4.1. Genworth Ombudsperson	7
3.4.2. Your Call Independent Whistleblower Service Provider	8
3.4.3. Eligible Recipients	9
3.4.4. Anonymity	9
3.4.5. Emergency Disclosures	10
3.4.6. Public Interest Disclosure	10
3.5. ADVISING IF A REPORT SHOULD BE CONSIDERED A PROTECTED DISCLOSURE	10
3.6. ASSESSMENT AND INVESTIGATION	11
3.6.1. Initial assessment of a Protected Disclosure	11
3.6.2. Investigating a Whistleblowing Report	11
3.6.3. Investigation Updates	12
3.6.4. Investigation Findings and Outcomes	12
3.7. PROTECTION OF THE ELIGIBLE WHISTLEBLOWER	12
3.7.1. Confidentiality	12
3.7.2. Additional Protections	13
3.7.3. Whistleblower Protection Officer	14
3.8. WRONGDOING/ACTION	14
3.9. FALSE REPORTING	14
3.10. REPORTING	15
<b>4. ROLES AND RESPONSIBILITIES</b>	<b>16</b>

4.1. OMBUDSPERSON.....	16
4.2. REPORTING INDIVIDUAL .....	16
4.3. HUMAN RESOURCES (WHISTLEBLOWER PROTECTION OFFICER) .....	16
4.4. SOURCING AND FACILITIES LEADER.....	16
4.5. LEGAL AND COMPLIANCE .....	17
<b>5. DOCUMENT INFORMATION.....</b>	<b>18</b>

## Company information table

### Confidentiality and Copyright

© Copyright 2019 Genworth Mortgage Insurance Australia Limited (Genworth). All rights reserved. This document is confidential. No part of this document may be reproduced in any form or by any means, or provided to any third party, without the express written permission of Genworth. Genworth, Genworth Financial and the Genworth logo are registered service marks of Genworth Financial, Inc.

### References within this document

Within this document, a reference to Genworth or 'the Company' refers to Genworth Mortgage Insurance Australia Limited and its subsidiary companies.

References to the Board are to the Boards of Directors of Genworth and its subsidiary companies unless a specific Board is specified. All References to amounts are in Australian Dollars (AUD).

# 1. Policy Overview

## 1.1. Policy statement

This Genworth Whistleblower Policy ("Policy ") fosters a working environment and culture that reflects Genworth's core values to act with integrity by allowing employees to raise concerns about unlawful, unethical or improper conduct occurring in the workplace. It outlines the reporting and investigatory processes that Genworth will adopt, and the protections provided, where disclosures relate to possible illegal, unethical or otherwise improper conduct.

This Policy forms part of Genworth's Operational Control Framework, which is made available to officers and staff via the Company's intranet and is also made publicly available via the Company's website.

## 1.2. Purpose

The purpose of the Policy is to:

- Ensure individuals are aware of the relevant procedures they should follow to make a disclosure;
- Ensure Eligible Whistleblowers are aware of legal protections available to them;
- Encourage individuals to report their concerns, preferably openly, but, if preferred, anonymously;
- Deter individuals from unlawful, unethical or improper conduct;
- Facilitate appropriate and timely responses to reports of possible illegal, unethical or otherwise improper conduct;
- Support the long-term sustainability and reputation of Genworth; and
- Provide further confidence to speak up to both employees and eligible non-employees who are aware of possible wrongdoing.

This Policy is a practical tool for creating safe and secure means of disclosing wrongdoing that may not have been reported and may have gone unidentified.

## 1.3. Scope

This Policy applies to Genworth, its subsidiary companies (collectively referred to as Genworth or Company), and the officers and employees of such entities, in relation to reports of possible Improper Conduct concerning Genworth. It is not intended to replace or supersede other policies within Genworth dealing with regular and ad hoc internal reporting, nor with employee grievance policies and procedures. It is to be read in conjunction with other applicable policies, including Integrity First and the Fit and Proper Policy.

## 2. Legal and Compliance Requirements

### 2.1. Legal requirements

Applicable regulatory and legislative requirements are listed below:

- Corporations Act 2001
- Taxation Administration Act 1953
- APRA CPS 520 Fit & Proper
- ASX Corporate Governance Principles and Recommendations

### 2.2. Review and update of the policy statement

This Policy and associated Company policies are reviewed regularly and at least every three years by Genworth's Legal and Compliance team to ensure that the practices and authorisations identified within it remain relevant to the business' current and planned operations.

## 3. Operating Principles and Guidelines

### 3.1. Who can make a report?

An individual can make a report under this Policy if they are currently associated, or previously has been associated with Genworth. Individuals associated with Genworth include:

- An officer or employee of Genworth;
- A contractor or supplier of Genworth (or an employee of that contractor or supplier); and
- A relative, spouse or dependent of an individual associated with Genworth.

Individuals who make a report to Genworth, or to any other body as outlined in section 3.4, are referred to as 'Reporting Individuals'. Reporting Individuals who qualify for certain legal protections are referred to in this Policy as 'Eligible Whistleblowers'.

### 3.2. Matters that should be reported

Individuals who detect, or have reasonable grounds for suspecting, Improper Conduct by Genworth or one of its officers or employees, are encouraged to report their concerns in accordance with the procedures outlined in this Policy. Improper Conduct includes:

#### 3.2.1. Breaches of Legal Obligations

Failure by Genworth or a representative of the Company to comply with any legal obligation e.g. the Corporations Act 2001 (Cth), tax legislation, prudential standards and other relevant Commonwealth or State legislation

#### 3.2.2. Fraudulent, other illegal activity or criminal offences

Intentional or reckless falsification, concealment or destruction of documents, misleading conduct and other criminal wrongdoings.

#### 3.2.3. Dishonest, corrupt and unethical conduct

Conduct where there is an abuse of position of trust to gain personal or financial advantage for the benefit of themselves or another person or other entities, including in relation to the Company's tax affairs.

#### 3.2.4. Unsafe work practices

Significant breaches of occupational, health and safety workplace standards and conduct amounting to bullying, harassment and discrimination.

#### 3.2.5. Other Improper Conduct

Conduct that represents a danger to the public or the financial system or may cause financial or non-financial loss to Genworth or be otherwise detrimental to the interests of the Company.

#### 3.2.6. Any deliberate concealment relating to any Improper Conduct.

Actions undertaken to ensure Improper Conduct is not noticed, uncovered or exposed by Genworth or one of its officers or employees, regulatory bodies and the public.

### 3.3. Excluded Matters

Personal work grievances should not be reported under this Policy. Personal work grievances are those that relate to the Reporting Individuals current or former employment and have, or tend to have, implications for the Reporting Individual personally, but do not have any significant implications for the entity (or another entity) or relate to any conduct, or alleged conduct, about a reportable matter. Examples of grievances which may be personal work-related grievances include:

- a) an interpersonal conflict between the discloser and another employee; and
- b) decisions that do not involve a breach of workplace laws:
  - o about the engagement, transfer or promotion of the discloser;
  - o about the terms and conditions of engagement of the discloser; or
  - o to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

Whilst personal work grievances are generally excluded, where the matter is a mixed report (i.e. includes both Improper Conduct and a personal grievance) the matter will be protected.

### 3.4. Making a Report

Generally, there are different internal channels available to Genworth employees to raise grievances and matters of concern, as outlined in Genworth's Code of Ethics. These include Human Resources staff, Legal or Compliance staff, Risk staff, Senior Leadership Team members, and through the Genworth Ombudsperson scheme. For individuals external to Genworth, this Policy lists the various avenues in which they will be able to make a report.

It is recognised that individuals considering whether to report or who have reported under this Policy may wish to obtain legal advice or legal representation. We encouraged individuals to seek independent legal advice to ensure they are fully informed prior to, throughout and after any reporting. Such disclosures are protected even in the event the legal practitioner concludes that a disclosure does not relate to a Protected Disclosure.

#### 3.4.1. Genworth Ombudsperson

The Ombudsperson role is established by the Company to receive and assess disclosures of the relevant kind (in addition to other matters). Reporting Individuals may wish to lodge reports directly with the Genworth Ombudsperson or via our external whistleblower service, Your Call.

Where whistleblowing protections are potentially available, other Genworth personnel receiving reports of grievances and concerns should encourage the Reporting Individual to raise the report with the Genworth Ombudsperson or via Your Call to ensure that they may receive assistance with understanding and accessing any applicable legal protections.

If the Report involves a Director, a member of Genworth Executive Management or involves a major financial issue the Ombudsperson may immediately discuss the matter with the Chairperson of the Board or Risk Committee (as appropriate).

Reports to the Ombudsperson may be made by:

- email to [GNWMORTAU.Ombudsperson@genworth.com](mailto:GNWMORTAU.Ombudsperson@genworth.com);

- telephone on 1800 213 140; or
- post to Genworth, 101 Miller Street, Level 26, North Sydney, NSW 2060. All reports sent by post should be clearly marked to the attention of the Ombudsperson.

### 3.4.2. Your Call Independent Whistleblower Service Provider

If Reporting Individuals for any reason you do not feel safe or able to make a Report internally they may do so to independent whistleblower service provider, Your Call.

Your Call operates under a Service Agreement with our organisation and acts as the intermediary, providing the means for a whistleblower to retain anonymity. Reports received by Your Call are provided to Genworth in accordance with this policy. Your Call also enables Genworth to obtain further information if required and enables the whistleblower to receive updates from Genworth.

This is done via the use of an online anonymous Message Board which the whistleblower will have access to after making a Report.

The Message Board allows the Reporting Individual to:

- communicate with Your Call and/or Genworth without revealing their identity
- securely upload any relevant documentation and/or material that the Reporting Individual wish to provide
- receive updates
- request support or report victimisation

Your Call enables confidential disclosures to be made anonymously. However, Reporting Individual may identify themselves to Your Call only or both Your Call and Genworth. Whilst we prefer whistleblowers disclose their identity in order to facilitate an investigation, whistleblowers are not required to identify themselves and will not be named in any report to Genworth unless they have consented to their identity being disclosed.

Your Call reporting options include:

- Website: <https://www.yourcall.com.au/report>

Available 24/7

Online reports can be made via the website address listed above. Genworth's organisation's unique identifier code is: "GMA101".

- Telephone: 1300 790 228

Available 9am and 12am on recognised Australian national business days (AEST)

If the Report relates to an individual at Genworth who receives or has access to whistleblower reporting, Your Call will exclude that individual from all communications when providing the Report to Genworth. Your Call will remain an independent intermediary at all times and only communicate with authorised individuals within our organisation.

### 3.4.3. Eligible Recipients

Not all grievances and matters of concern will amount to Improper Conduct. To qualify for whistleblowing protections, a Reporting Individual must make a report to any of the following recipients (Eligible Recipient):

- (a) Genworth Ombudsperson or Your Call;
- (b) The internal auditor or a member of a team conducting an audit;
- (c) A director, secretary or senior manager of the company;
- (d) An actuary of the Company;
- (e) ASIC (for more information please refer to [ASIC Information Sheet 239 How ASIC handles whistleblower reports](#));
- (f) APRA;
- (g) A member of the Australian Federal Police.

In relation to Reports concerning potential Improper Conduct regarding the Company's taxation affairs:

- (a) A registered tax agent or BAS agent who provides services to the Company; or
- (b) A Company employee or officer who has functions or duties in relation to the Company's tax affairs.

The role of an eligible recipient is to receive disclosures that may potentially qualify for protection. Although the status of the disclosure may not be known at the time of reporting, the Reporting Individual qualifies for protection from the time of reporting and all disclosures should be treated as if they were Protected Disclosures until otherwise advised.

### 3.4.4. Anonymity

In keeping with a culture of openness and transparency, the Company prefers that Reporting Individuals raise concerns in Improper Conduct openly and feel comfortable to disclosing their identity. However, Reporting Individuals are also able to report issues anonymously including via Your Call rather than directly to the Genworth Ombudsperson or other Genworth Eligible Recipient. Making an anonymous disclosure will not impact the protection afforded to the matter (i.e. anonymous disclosures will be protected in the same manner as disclosures reported on a non-anonymous basis).

Individuals should be aware that it may be more difficult to investigate reports made anonymously. Maintaining anonymity of the Reporting Individuals identity may be difficult:

- where the nature of the Report suggests that it was made by one particular individual;
- due to the inherent nature of any investigation process.

Reporting Individuals are able to refuse to answer questions which they feel could reveal their identity during follow up discussions and they may choose to remain anonymous throughout each phase of this Policy including throughout the investigation and after completion of the investigation.

One method of preserving anonymity which could be utilised is the adoption of a pseudonym. A Reporting Individual may wish to adopt a pseudonym in situations where their identity is known to the Eligible Recipient but the Reporting individual prefers not to disclose their identity to others.

We encourage Reporting Individuals who wish to remain anonymous to maintain ongoing two-way communication to allow follow up questions or feedback to be provided.

#### 3.4.5. Emergency Disclosures

Under the legislation, an emergency Report on Improper Conduct (not in relation to the Company's taxation affairs) may also be considered a Protected Disclosure if it is made by an Eligible Whistleblower to a journalist or Member of Parliament, but only:

- (a) for matters that were in a Protected Disclosure to ASIC or APRA;
- (b) if there are reasonable grounds to believe that there is a substantial an imminent risk of serious harm or danger to public health or safety, or to the financial system, if not acted on immediately; and
- (c) if the previous recipient (ASIC or APRA) has been provided with prior written notice of the intended emergency disclosure.

Eligible Whistleblowers are encouraged to contact the Genworth Ombudsperson or to seek independent legal advice to ensure they understand the criteria for making an emergency disclosure that qualifies for protection.

#### 3.4.6. Public Interest Disclosure

Under the legislation, a public interest Report on Improper Conduct (not in relation to the Company's taxation affairs) may also be considered a Protected Disclosure if it is made by an Eligible Whistleblower to a journalist or Member of Parliament, but only:

- (a) for matters that were in a Protected Disclosure to ASIC or APRA;
- (b) if it has been at least 90 days since the previous disclosure and there are no reasonable grounds to believe that action is being or has been taken;
- (c) if there are reasonable grounds to believe that a further disclosure will be in public interest; and
- (d) if the previous recipient (ASIC or APRA) has been provided with prior written notice of the intended public interest disclosure.

Eligible Whistleblowers are encouraged to contact the Genworth Ombudsperson or to seek independent legal advice to ensure they understand the criteria for making a public interest disclosure that qualifies for protection.

### **3.5. Advising if a Report should be considered a Protected Disclosure**

The Corporations Act includes certain obligations in relation to Protected Disclosures relating to Improper Conduct. Reports will be obliged to be treated as Protected Disclosure where Improper Conduct is alleged, and other relevant procedural steps are followed. Upon receipt of a Report, the Ombudsperson (or other person receiving the Report) will determine whether, in Genworth's view, the Report qualifies as a Protected Disclosure. The Reporting Individual will then be advised of this determination. Where a Report is considered a Protected Disclosure, the Reporting Individual who made the Report will be an Eligible Whistleblower.

A Report may be declined to be treated as a Protected Disclosure if it is considered that:

- The individual making the Report is not an Eligible Whistleblower

- The information has not been made to an Eligible Recipient
- There is insufficient information in the Report to allow the matter to be investigated;
- the subject matter of the Report has been satisfactorily dealt with or resolved previously (unless another alleged incident has occurred since);
- the information does not concern potential Improper Conduct in relation to Genworth, or there are no reasonable grounds for suspecting such Improper Conduct.

## 3.6. Assessment and Investigation

### 3.6.1. Initial assessment of a Protected Disclosure

For all Protected Disclosures, an initial assessment of the matter will be performed as soon as possible. This assessment will include:

- Assessing the risk of detriment to Reporting Individual; and
- Determining what, if any, internal notifications should occur.

Depending on the risk of detriment, the Genworth Ombudsperson may decide to:

- inform the Reporting Individual of the range of support services available including the offering of additional support services which are considered appropriate based on the Protected Disclosure (for example it would be typical to inform Reporting Individuals who are employees of Genworth's employee assistance program – Lifeworks);
- take specific actions to help a Reporting Individual minimise or manage stress, time, performance impacts or other challenges resulting from the Protected Disclosure or its investigation (for example, relocation or reassignment of the Reporting Individual or other employees associated with the Protected Disclosure); and
- take appropriate steps to:
  - ensure that management are aware of their responsibilities;
  - address the risks of isolation or harassment;
  - manage conflicts; and
  - ensure fairness in performance management outcomes.

### 3.6.2. Investigating a Whistleblowing Report

Where the Ombudsperson or other Genworth Eligible Recipient receives a Report in relation to potential Improper Conduct, an investigation will be conducted. The objective of an investigation will be to locate, identify or gather evidence regarding the matters alleged in the Report in a manner to preserve the welfare of the reporting individual and to maintain anonymity (if required).

The Genworth Ombudsperson will determine the:

- nature and scope of the investigation;
- person(s) within and/or outside Genworth that should lead the investigation;

- Nature of any technical, financial or legal advice or resources that may be required to support the investigation; and
- timeframes in which the investigation will be performed.

The Genworth Ombudsperson will be responsible in ensuring that the investigation is thorough, objective, fair and independent.

### 3.6.3. Investigation Updates

Reporting Individuals are encouraged to stay in touch with the Genworth representative who is handling the Report, so that they may be informed about the current status of the matter (if necessary or appropriate) subject to commercial, legal and confidentiality restraints; and appropriate next steps. If it is considered necessary or appropriate, the Reporting Individual will be advised of the outcome of the investigation. Where the Report has been made anonymously, this may not be possible.

Where a Report has been made via the Your Call service, you will be provided with a unique identifier which will allow you to access investigation outcomes or updates. You will also be able to provide further information regarding this matter.

### 3.6.4. Investigation Findings and Outcomes

The Genworth Ombudsperson will be responsible for the documentation and reporting of any findings resulting from an investigation. This includes, where communication is possible and where it is appropriate, the reporting of outcomes to Eligible Whistleblowers. At a minimum, and where communication is possible, the Eligible Whistleblower will be informed when the investigation has concluded.

Where an Eligible Whistleblower is unsatisfied with the outcomes of an investigation, they may request an independent review of the handling of the matter to be performed. In such circumstances, the Genworth Ombudsperson will facilitate the appointment of an investigator who is independent of the previously performed investigation. Eligible Whistleblowers may also choose to raise their concerns with the investigation with a regulator, such as APRA or ASIC.

## 3.7. Protection of the Eligible Whistleblower

### 3.7.1. Confidentiality

Where an Eligible Whistleblower makes a Report that is a Protected Disclosure, the person to whom the Report is made must ensure that the identity of the Eligible Whistleblower is kept confidential, secure all documentation and information relating to the Report and not disclose any information that is likely to lead to the identification of the Eligible Whistleblower, unless:

- (a) the Eligible Whistleblower consents to the disclosure of his/her identity; or
- (b) required or authorised by law (for example, to enable the disclosure to be made to ASIC, APRA, the ATO, the Australian Federal Police or to a legal practitioner for the purposes of obtaining advice).

In practice, preventing the identity of the Reporting Individual from becoming known may be difficult in certain circumstances including where:

- the nature of the Report suggests that it was made by one particular individual; or

- the investigation process necessitates interactions with others. (Where relevant, this should be discussed with the Reporting Individual).

### Confidentiality Measures

The Genworth Ombudsperson, in conjunction with Eligible Recipients, are responsible for ensuring:

- all paper and electronic documents and other materials relating to disclosures are stored securely;
- all information relating to a disclosure can only be accessed by those directly involved in managing and investigating the disclosure;
- only a restricted number of people who are directly involved in handling and investigating a disclosure are made aware of a discloser's identity or information that is likely to lead to the identification of the discloser;
- communications and documents relating to the investigation of a disclosure are not sent to an email address or to a printer that can be accessed by other staff; and
- each person who is involved in handling and investigating a disclosure is reminded that they should keep the identity of the discloser and the disclosure confidential and that an unauthorised disclosure of a discloser's identity may be a criminal offence.

### Confidentiality Concerns

Reporting Individuals are encouraged to report any concerns with, or evidences of breaches of, confidentiality requirements to the Genworth Ombudsperson using the contact details outlined in section 3.4.1. Reporting Individuals may also choose to report their concerns to a regulatory body, such as ASIC or APRA, for investigation.

### Further Supporting Whistleblowers from Detriment

Genworth expects that all employees, officers and suppliers will support our organisational values and our willingness to have employees raise matters in a safe and secure manner by not engaging in conduct in relation to which may:

- inhibit a person raising concerns via this Policy;
- detriment a person who is suspected of raising concerns via this Policy; or
- in any way threatens a person who is suspected of raising concerns via this Policy.

#### 3.7.2. Additional Protections

In circumstances where a Protected Disclosure is made, the Eligible Whistleblower is protected from certain consequences which might otherwise result from making the disclosure 'Detrimental Conduct'. Specifically, they will not be subject to any civil, criminal or administrative liability, including disciplinary action, no contract may be enforced contrary to their interests, and the information may not be used in legal proceedings against the person, unless the information is alleged to be false and reporting a matter does not grant the Reporting Individual immunity for any misconduct a disclosure has engaged in that is revealed in Protected Disclosure.

Examples of Detrimental Conduct includes:

- dismissal of an employee;

- (b) injury of an employee in his or her employment;
- (c) alteration of an employee's position or duties to his or her disadvantage;
- (d) discrimination between an employee and other employees of the same employer;
- (e) harassment or intimidation of a person;
- (f) harm or injury to a person, including psychological harm;
- (g) damage to a person's property;
- (h) damage to a person's reputation;
- (i) damage to a person's business or financial position; or
- (j) any other damage to a person.

Eligible Whistleblowers may be entitled to compensation in certain circumstances if such protection is not provided and may seek independent legal advice or contact regulatory bodies, such as APRA or ASIC, if they believe they have suffered detriment.

Genworth will seek to ensure that Eligible Whistleblowers who are employees are protected from victimisation, discrimination, intimidation and damage to reputation or threats of this kind. This may include taking administrative or other reasonable action to protect a Reporting Individual from detriment. For example, where Eligible Disclosure relates to a Reporting Individuals work area.

Protecting a Reporting Individual from detriment does not prevent Genworth from managing a Reporting Individuals performance in line with our performance management framework. Where this occurs care will be taken to ensure the Reporting Individual understands the reason for any administrative or management action.

### 3.7.3. Whistleblower Protection Officer

Where requested by the Eligible Whistleblower who is an employee, a Whistleblower Protection Officer (WPO) will be appointed. The WPO will be the Chief Human Resources Officer or their delegate. The role of WPO is to safeguard the interests of the Eligible Whistleblower in terms of any applicable legislation (including the Corporations Act), and this Policy, however the WPO is not able to provide legal advice to the Eligible Whistleblower. Following their appointment, the WPO will be briefed in relation to the Protected Disclosure.

## 3.8. Wrongdoing/Action

Where any wrongdoing is uncovered as a result of a Protected Disclosure, the matter and suggested actions will be reported to the Chief Executive Officer, or in the case of a serious or substantial wrongdoing, to the Board who, in each case, will approve the appropriate response.

## 3.9. False Reporting

If it is found that an employee making a Report (whether accepted as a Protected Disclosure or not) has knowingly made a false Report, then the conduct of the employee will be considered a serious matter. The employee may then be subject to disciplinary action. Reports can still qualify for protection even if the Report turns out to be incorrect or unfounded upon investigation. Incorrect or unfounded reports are not automatically considered False Reports.

### 3.10. Reporting

The Ombudsperson must:

- (a) Immediately notify the Chair of the Audit Committee where a report related to serious misconduct.
  - (b) provide a quarterly report to the Chief Ombudsperson at Genworth Financial; and
  - (c) a quarterly report to the Audit Committee;
- regarding Reports made and any Protected Disclosures.

Consent will be obtained from the Eligible Whistleblower prior to reporting their identify or information likely to infer their identity.

#### Communication with Reporting Individuals

The Ombudsperson will also, where communication is possible:

- Acknowledge receipt of a potential whistleblower report;
- Confirm if the disclosure will be treated as a Protected Disclosure;
- Provide any notifications or communications following the initial detriment assessment;
- Provide ongoing communications as an investigation progresses; and
- Confirming when the investigation has concluded and, where appropriate, providing the outcomes of the investigation.

## 4. Roles and Responsibilities

This section identifies the individual roles (by title) and responsibilities associated with the management/implementation of this policy.

### 4.1. Ombudsperson

- A contact point where employees can seek accurate and confidential information about how this Policy works, what the Policy covers and how a disclosure might be handled, without making a disclosure;
- Alignment of processes and procedures to this Policy;
- Receive and consider Reports made pursuant to this Policy;
- Determine, in consultation with the Company's legal advisers, whether Reports qualify as Protected Disclosures;
- Discuss matters involving a Director or member of SLT with Chairman of Board or Risk Committee (as appropriate);
- Conduct investigations in relation to Reports;
- Ensure confidentiality is maintained;
- Brief the WPO in relation to the Protected Disclosure (where a WPO is appointed); and
- Provide a quarterly report to the Chief Ombudsperson at Genworth Financial and a quarterly report to the Audit Committee regarding Reports made and any Protected Disclosures.
- Ensures appropriate records are maintained for each step in the process.
- The development of an awareness program following any updates to this Policy to ensure changes are wide disseminated and accessible to individuals covered by this Policy.

### 4.2. Reporting Individual

- Report any instances of potential Improper Conduct in accordance with the procedures outlined in this Policy.

### 4.3. Human Resources (Whistleblower Protection Officer)

- Serve as Whistleblower Protection Officer when requested by an Eligible Whistleblower who is an employee;
- Assist in the safeguarding of the interests of the Eligible Whistleblower in terms of the applicable legislation and this Policy; and
- Ensure confidentiality is maintained.

### 4.4. Sourcing and Facilities Leader

- Assist the Ombudsperson and any other Eligible Recipient with legal obligations as relevant to reports made by suppliers, employees of suppliers or contractors; and
- Communicate the Policy to all our current and future suppliers and contractors

#### **4.5. Legal and Compliance**

- Regularly review the currency of this Policy;
- Assist the Ombudsperson and any other Eligible Recipient with legal obligations as relevant to this Policy; and
- Provide advice to the Company in relation to matters which are the subject of this Policy.

## 5. Document information

### Version history

Version	Approved date
1.0	15/06/2015
2.0	18/04/2016
3.0	25/06/2018
4.0	23/04/2019
5.0	4/12/2019

### Reference documents

The following documents have been referenced in the preparation of this policy.

Ref.	Document name	Business owner
1.	<i>Integrity First</i> , which includes the Genworth Financial Inc. (GFI) Privacy Policy	GFI Compliance Leader
2.	Genworth Privacy Policy	General Counsel & Company Secretary
3.	Genworth Credit Reporting Policy	General Counsel & Company Secretary
4.	Genworth Fit & Proper Policy	Chief Human Resource Officer (CHRO)
5.	Genworth Workplace Standards Policy	Chief Human Resources Officer
6.	Genworth Anti-Bribery & Corruption Policy	General Counsel & Company Secretary