

# **Verizon Whistleblowing Policy**

September 2022

## 1 Purpose

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This Policy provides an overview of Applicable Whistleblowing Legislation to deter wrongdoing at Verizon and the Group by encouraging the reporting of misconduct through a safe and secure process, which protects and supports individuals who make such disclosures.

This Policy sets out details on how to raise a concern regarding suspected or observed misconduct within Verizon and the Group about certain matters. It also describes how Verizon will treat and process such reports in accordance with its obligations under Applicable Whistleblowing Legislation. At Verizon, we encourage the reporting of misconduct as soon as possible.

This Policy applies to all Eligible Persons. While it provides an overview of the Applicable Whistleblowing Legislation, Verizon encourages all Eligible Persons to obtain independent legal advice prior to making any disclosure in reliance on this Policy and the Applicable Whistleblowing Legislation to confirm whether that disclosure constitutes a Protected Disclosure.

This Policy does not form part of any employee's employment contract, nor does it constitute terms and conditions of employment with Verizon or give rise to any contractual rights or entitlements. This Policy may be amended or replaced by Verizon from time to time in its sole discretion.

**Please note that capitalised terms used throughout this Policy are defined at section 15 of this Policy.**

## 2 What is a Protected Disclosure?

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It is a report, complaint, concern, or information that someone within Verizon or the Group has or may have engaged in wrongdoing or conduct that is improper, illegal, or concerns an improper state of affairs.

However, this Policy and the Applicable Whistleblowing Legislation covers only a Protected Disclosure. It is important to note that a disclosure which does not satisfy the criteria of a Protected Disclosure may not be covered or protected by this Policy or Applicable Whistleblowing Legislation.

## 3 Who can make a protected disclosure?

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Any Eligible Person can choose to make a disclosure at any time, including outside of business hours.

## 4 What wrongdoing can be disclosed?

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A disclosure may be made if an Eligible Person has reasonable grounds to suspect that the information they hold concerns misconduct, an improper state of affairs (including in relation to tax affairs), or certain circumstances in relation to Verizon or a Group Company, or an officer or employee of Verizon or a Group Company. Such wrongdoing may include, but is not limited to:

- (a) failure to comply with, or the breach of, legal requirements as well as other illegal conduct such as theft, drug use, violence or threatened violence, or criminal damage to property;
- (b) fraud, money laundering or misappropriation of funds;
- (c) offering or accepting a bribe;
- (d) financial irregularities (including in relation to tax affairs); or
- (e) engaging in or threatening to engage in detrimental conduct against a person who has made a Protected Disclosure, or is believed or suspected to have made, or be planning to make, such a disclosure.

This information may indicate that the person, Verizon or a Group Company has engaged in conduct that:

- (a) constitutes an offence against, or a contravention of the Relevant Laws; or
- (b) constitutes an offence against a law of the Commonwealth that carries a punishment of imprisonment for 12 months or more; or
- (c) represents a danger to the safety of the public or to the stability of, or confidence in, the financial system.

A Protected Disclosure does not necessarily need to involve a breach or contravention of any law and may include a Disclosable Personal Work-Related Grievance (see section 5).

It is important to note that an Eligible Person may still qualify for protection under this Policy and Applicable Whistleblowing Legislation even if the information contained in the Protected Disclosure is found to be incorrect. However, Verizon discourages any person from making any deliberately false statement. The making of a deliberately false statement may lead to disciplinary action, up to and including, summary termination of employment without notice or payment in lieu of notice.

## **5 What may not be protected?**

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The protections described in this Policy and under Applicable Whistleblowing Legislation do not extend to disclosures about an Eligible Person's Personal Work-Related Grievance. Examples of a Personal Work-Related Grievance include, but are not limited to:

- (a) a decision to suspend or terminate the employment of the Eligible Person;
- (b) a decision to take any other disciplinary action against the Eligible Person; or
- (c) a decision relating to the terms and conditions of employment of the Eligible Person.

The disclosure of a personal work-related grievance may still qualify for protection if it is a Disclosable Personal Work-Related Grievance.

## **6 How can an eligible person disclose wrongdoing?**

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An Eligible Person can disclose wrongdoing of the kind described in section 4 above, or seek further information regarding the making of a disclosure, to:

- (a) an officer or Senior Manager of Verizon or a Group Company;
- (b) an external auditor, or a member of an external audit team conducting an audit of Verizon or a Group Company;
- (c) an actuary of Verizon or a Group Company;
- (d) Verizon Ethics;
- (e) the Legal, Human Resources, Employee Relations or Internal Audit departments;
- (f) a legal practitioner, who may be external to Verizon, for the purpose of obtaining legal advice or legal representation in relation to whistleblowing provisions of Applicable Whistleblowing Legislation, including as set out in this Policy; or
- (g) a Regulatory Body.

The contact details for relevant persons listed above can be found on VZWeb, or otherwise on the website for any Regulatory Body.

An Eligible Person must disclose wrongdoing to one of the above persons or bodies in order to receive protection in accordance with this Policy and under Applicable Whistleblowing Legislation.

## **7 Do I have to identify myself?**

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No, an Eligible Person can choose to remain anonymous and does not have to identify themselves in order to qualify for protection under this Policy and Applicable Whistleblowing Legislation. In order to do so, an Eligible Person may contact the Verizon Ethics at [www.verizonethics.com](http://www.verizonethics.com) or [ethics@verizon.com](mailto:ethics@verizon.com), and ask to remain anonymous or use an anonymised email address to disclose wrongdoing. Alternatively, an Eligible Person may use a pseudonym when making such a disclosure.

An Eligible Person who has chosen to remain anonymous will remain anonymous while making a disclosure, over the course of any investigation and after such an investigation is finalised. However, Verizon encourages any Eligible Person making a disclosure to remain in communication with Verizon throughout such processes to assist with any investigation as requested.

If an Eligible Person is concerned that their anonymity may be at risk, Verizon encourages the Eligible Person to raise such concerns and permits the Eligible Person to refuse to answer any question that could reveal the Eligible Person's identity.

The identity of an Eligible Person who has made a Protected Disclosure (Discloser) and identified themselves in doing so, will remain confidential to the extent permitted by law, unless disclosed with the prior consent of the Discloser.

Eligible Persons should keep in mind that Verizon is only able to investigate a disclosure based on the information it has available to it. As a result, Verizon encourages a Discloser to participate, and remain available to participate, in any investigation.

## **8 Protections**

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The following protections apply to Protected Disclosures made in accordance with this Policy and Applicable Whistleblowing Legislation.

### **Identity protection**

Verizon, or any person to whom a disclosure is made, is obliged to protect the confidentiality of a Discloser's identity. It is illegal, and no person is permitted, to disclose the identity of a Discloser or any information that is likely to lead to the identification of a Discloser, unless otherwise permitted by law.

Verizon will protect the identity of a Discloser by taking the following steps:

- (a) ensuring that any information, documentation or other records relating to the disclosure are redacted as appropriate;
- (b) disclosures will be handled and investigated by qualified persons;
- (c) information, documentation and other records relating to the disclosure are stored securely and only accessible by those directly involved in managing and investigating any disclosure; and
- (d) any persons directly involved in the management or investigation of any disclosure will be reminded about their confidentiality obligations and the consequences of a breach of confidentiality.

A Discloser can lodge a complaint regarding a breach of confidentiality to Verizon Ethics or otherwise to a Regulatory Body.

### **Protection from detrimental acts or omissions**

Verizon is committed to providing support and protection in response to disclosures of wrongdoing by a Discloser in accordance with this Policy and Applicable Whistleblowing Legislation and will not tolerate reprisals or threats of reprisals against a Discloser who has made, or is believed or suspected of having made or planning to make, a Protected Disclosure.

Verizon will not tolerate any detrimental conduct or the ill treatment, including victimisation or bullying, of any Discloser. Verizon will not tolerate express or implied threats (whether conditional or unconditional) or conduct that causes any detriment to another person where the person threatens or carries out conduct, because they believe or suspect that the other person is, may or has been, a Discloser who has or may make a Protected Disclosure.

Examples of detrimental conduct that is prohibited includes, but is not limited to:

- (a) discrimination, harassment or intimidation towards a person;
- (b) improper termination of employment;
- (c) physical or psychological harm or injury, or any other damage to a person; or
- (d) damage to a person's property, reputation, business or financial position.

Detrimental conduct does not include reasonable management actions based on reasonable grounds, including performance management or other administrative action.

Verizon will protect a Discloser from detrimental acts or omissions by:

- (a) providing support services such as those outlined at section 10 of this Policy;
- (b) working with the Discloser to manage any risk of detriment, including intervening where appropriate and making appropriate adjustments to the Discloser's employment or engagement to manage such risks;
- (c) ensuring a Discloser has access to appropriate processes and reporting lines for lodging complaints or concerns that they may have suffered, or may suffer, detriment; and
- (d) subjecting any person found to have engaged in such behaviour to disciplinary action, up to and including summary termination of employment without notice or payment in lieu of notice.

If a Discloser has suffered, or believes they may suffer, detriment, they are encouraged to notify the appropriate person at Verizon, or if they do not feel comfortable doing so, an appropriate person at another Group Company or a Regulatory Body.

### **Compensation and other remedies**

Any Discloser may seek compensation and other remedies through the courts if they suffer loss, damage or injury because of a disclosure, where reasonable precautions have not been taken, and due diligence exercised, to prevent the detrimental conduct.

### **Civil, criminal and administrative liability protection**

A Discloser is also protected as follows:

- (a) they are protected from any civil, criminal or administrative liability (including disciplinary action by Verizon) for making a Protected Disclosure;

- (b) no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against the Discloser on the basis of their Protected Disclosure; and
- (c) the information they have disclosed is not admissible in evidence against the person in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.

A Discloser will not have any immunity with respect to any misconduct engaged in by the Discloser that is revealed in their disclosure.

## 9 Investigating disclosures

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Where a Protected Disclosure is made, Verizon will investigate the disclosure in accordance with its policies and procedures, as may be amended from time to time, including by:

- considering whether the disclosure is a Protected Disclosure in the first instance;
- considering the information disclosed and whether the allegations constitute a potential misconduct or an improper state of affairs;
- deciding whether to launch an investigation, and determining the scope of such an investigation, within 10 business days of receiving sufficient information about the potential misconduct;
- if an investigation is determined appropriate:
  - appointing an appropriate investigator;
  - collecting material required to consider the allegations disclosed and whether the allegations are to be transferred to another department within Verizon;
  - the investigator leading an investigation in conjunction with the appropriate team at Verizon;
  - the relevant team considering the findings and conclusions of the investigation and deciding whether the matter is to be closed, transferred to another department for the undertaking of alternative actions or whether a matter report is to be drafted;
- if a matter report is drafted, appropriate persons at Verizon will review the matter report and its recommendations and implement them as appropriate; and
- the matter will be closed in Verizon's matter management system once a final decision has been implemented.

Verizon is only able to investigate a disclosure based on the information it has available to it. As a result, Verizon encourages a Discloser to participate, and remain available to participate, in any investigation.

Verizon will attempt to investigate disclosures within 60 days where possible. However, how quickly an investigation may be conducted will depend on the relevant disclosure and may require further time. Verizon will keep a Discloser informed of the status of an investigation as appropriate depending on the nature of the disclosure.

A record of each investigation conducted, the material collected as part of the investigation and its outcome, will be compiled in a report to be maintained by Verizon. This report will be provided to the appropriate person with oversight and responsibility for complying with Verizon's obligations under this Policy and Applicable Whistleblowing Legislation.

A Discloser will be provided with the outcome of any investigation and details of any actions taken in response to that outcome (if appropriate) but will not be provided with the final report or any material collected as part of the investigation.

## **10 Support**

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Verizon understands that making a Protected Disclosure can be challenging and will take appropriate steps to support the health and wellbeing of a Discloser making a Protected Disclosure. This support may be in the form of:

- the Employee Assistance Program which can be accessed at [www.anthem.com/eap/verizon](http://www.anthem.com/eap/verizon);
- considering whether the Discloser can, or should, be allocated alternative duties; and
- considering whether the Discloser can, or should, be permitted paid time off work outside of their statutory entitlements.

## **11 Treatment of employees mentioned in Protected Disclosures**

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Where Verizon's officers or employees are mentioned in, or are related to a matter about which a Discloser has made a Protected Disclosure (including as the subject matter of a Protected Disclosure), Verizon will take reasonable steps to ensure appropriate treatment of any named employees. This may include, but is not limited to:

- (a) keeping the matter of the disclosure and any investigation as confidential as possible;
- (b) ensuring that any investigation is conducted in an objective, fair and independent manner by an appropriate investigator;
- (c) ensuring that the objective of any investigation is to determine whether there is sufficient evidence to substantiate or refute the matters raised in any disclosure;
- (d) informing investigators, managers and officers only on a need-to-know basis; and
- (e) ensuring that the subject of any disclosure is advised about the subject matter of the disclosure and afforded procedural fairness prior to any disciplinary action being taken ; and
- (f) ensuring that the subject of any disclosure has access to appropriate support services (including those described in section 10).

Verizon will not tolerate detrimental conduct to or the ill treatment, including victimisation or bullying, of any employee mentioned in, or related to, a disclosure of the kind protected under this Policy and Applicable Whistleblowing Legislation. If you become aware of such detrimental conduct or ill treatment you should raise this with an appropriate person at Verizon or a Group Company. Any person found to be treating others in such a way will be subject to disciplinary action, up to and including summary termination of employment without notice or payment in lieu of notice.



## 12 Where can I find this Policy?

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This Policy is available to all officers and employees of Verizon through VZWeb or can be accessed by requesting a copy from Verizon Ethics.

## 13 Emergency and public interest disclosures

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Verizon encourages Eligible Persons to make use of the whistleblowing procedures set out in this Policy so that it is not necessary to make an Emergency Disclosure or a Public Interest Disclosure.

However, Verizon acknowledges that in some circumstances, it may be necessary for individuals to make such disclosures. However, Eligible Persons should understand, and seek independent legal advice in relation to, the criteria for making such disclosures. These criteria include, but are not limited to, that the disclosure must have previously been made in writing to a Regulatory Body in the first instance. With respect to Public Interest Disclosures, 90 days must have passed since this initial disclosure.

Verizon will comply with this Policy and its obligations under Applicable Whistleblowing Legislation with respect of such disclosures.

## 14 Review

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This policy was last reviewed in September 2022. This policy will be reviewed annually and updated as necessary in accordance with Verizon's obligations under Applicable Whistleblowing Legislation.

## 15 Definitions

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For the purposes of this Policy, these terms shall have the following meanings:

**Applicable Whistleblowing Legislation** means both the Corporations Act and the *Tax Administration Act 1953* (Cth);

**Verizon** means Verizon Australia Pty Ltd (ABN 62 081 001 194).

**Corporations Act** means the *Corporations Act 2001* (Cth);

**Disclosable Personal Work-Related Grievance** means a disclosure that:

- (a) relates to victimisation, or alleged victimisation, as described in the Corporations Act, that causes detriment, or threatens to cause detriment, to the Eligible Person;
- (b) includes, or is accompanied by, information about wrongdoing or misconduct (see section 4);

- (c) involves a breach of employment or other laws punishable by a period of imprisonment of 12 months or more;
- (d) involves conduct that represents a danger to the public;
- (e) relates to information that suggests misconduct or wrongdoing (see section 4) beyond the Eligible Person's personal circumstances; or
- (f) occurs where the Eligible Person seeks legal advice or representation about the operation of the whistleblower provisions under Applicable Whistleblowing Legislation;

**Discloser** means an Eligible Person who has made a Protected Disclosure;

**Eligible Person** means a person who is, or has been, any of the following:

- (a) an officer of Verizon;
- (b) an employee of Verizon;
- (c) an individual who supplies services or goods to Verizon (paid or unpaid);
- (d) an employee of a person who supplies services or goods to Verizon (paid or unpaid);
- (e) an individual who is an associate of Verizon; and
- (f) a relative or dependent of an individual of anyone in (a) to (e) above;

**Emergency Disclosure** means a disclosure where:

- (a) the Discloser has previously made a Protected Disclosure of that information;
- (b) the Discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health and safety of one or more persons or to the natural environment;
- (c) the Discloser notified (in writing) the body to which it made the disclosure that:
  - (i) includes sufficient information to identify the previous disclosure; and
  - (ii) states that the Discloser intends to make an emergency disclosure; and
- (d) disclosure is made to:
  - (i) a member of federal parliament; or
  - (ii) a journalist; and

- (e) the extent of the information disclosed in the emergency disclosure is no greater than necessary to inform the recipient in (d) above of the substantial and imminent danger;

**Group** means Verizon and each of its Related Bodies Corporate together, each being a **Group Company**.

**Personal Work-Related Grievance** means a grievance relating to an Eligible Person's employment which has implications for the Eligible Person personally, but not Verizon or a Group Company, and is not a matter described in section 4;

**Policy** means this document;

**Public Interest Disclosure** means a disclosure where:

- (a) the Discloser has previously made a Protected Disclosure of that information;
- (b) at least 90 days have passed since the previous disclosure;
- (c) the Discloser doesn't have reasonable grounds to believe action is being taken in relation to the previous disclosure;
- (d) the Discloser has reasonable grounds to believe that making a further disclosure is in the public interest;
- (e) following 90 days, the Discloser notified (in writing) the body to which it made the disclosure that:
  - (i) includes sufficient information to identify the previous disclosure; and
  - (ii) states that the discloser intends to make a public interest disclosure; and
- (f) the public interest disclosure is made to:
  - (i) a member of federal parliament; or
  - (ii) a journalist; and
- (g) the extent of the information disclosed in the public interest disclosure is no greater than necessary to inform the recipient in (f) above of the misconduct or the relevant information;

**Regulatory Body** means:

- (a) the Australian Securities and Investments Commission;
- (b) the Australian Prudential Regulation Authority;
- (c) the Australian Tax Office; or

(d) any other regulatory body prescribed under Applicable Whistleblowing Legislation;

**Related Body Corporate** has the meaning given to that term under the Corporations Act;

**Relevant Laws** means the Corporations Act, the *Australian Securities and Investments Commission Act 2001* (Cth), the *Banking Act 1959* (Cth), the *Financial Sector (Collection of Data) Act 2001* (Cth), the *Insurance Act 1973* (Cth), the *National Consumer Credit Protection Act 2009* (Cth), the *Superannuation Industry (Supervision) Act 1993* (Cth), *Tax Administration Act 1953* (Cth), or any instrument under any one of these laws;

**Senior Manager** means a person who makes decisions that affect the whole, or a substantial part, of Verizon's business or who has the capacity to significantly affect Verizon's financial standing.