



7-ELEVEN WHISTLEBLOWER POLICY

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1 PURPOSE

- 1.1 This Whistleblower Policy (**Policy**) is intended to encourage and enable team members of 7-Eleven Stores Pty Ltd (**7-Eleven**) and Convenience Holdings Pty Ltd (**Convenience Holdings**) (together, the **Group**) or other individuals covered by this Policy to raise genuine issues and concerns in regard to misconduct, unethical or illegal activity, breaches of the Codes of Conduct (as defined below), or malpractice in the Group without fear of intimidation or reprisal.
- 1.2 This Policy is also intended to meet the Group's legislative obligations and ensure statutory protection is provided to those individuals who raise a genuine issue or concern that qualifies for protection under the Corporations Act 2001 (Cth) (**Corporations Act**) and Taxation Administration Act 1958 (Cth) (**Tax Administration Act**).

2 POLICY STATEMENT

- 2.1 This Policy is intended to support the Convenience Holdings Code of Conduct and the 7-Eleven Code of Conduct (**Codes of Conduct**). All members of the Group have a responsibility for the success of this Policy. If you think, or suspect, that something is wrong you have a duty to raise questions and report concerns as soon as practically possible.

3 SCOPE

- 3.1 This Policy outlines how you can raise concerns which you have reasonable grounds to believe amount to actual, suspected or anticipated wrongdoing within the Group. Concerns may include:
 - dishonest, unethical, fraudulent, illegal or corrupt behavior;
 - breach of any legislation; and
 - any other conduct, deliberate or otherwise, that may cause material financial or non-financial loss to the Group.
- 3.2 Concerns can be reported even if they address conduct which does not involve a contravention of a particular law. For example, if the information would be of interest to a regulatory authority. In addition, information that suggests a significant risk to public safety or stability in the financial system can similarly be reported under this Policy even if it does not involve a breach of a particular law. It is important to be aware that not all concerns raised under this Policy will necessarily qualify for statutory protection under the Corporations Act or Tax Administration Act. A reported concern will only qualify for statutory protection if it meets each of the requirements identified in section 10 below. However, in some circumstances protections may still be available under other legislation, such as the Fair Work Act 2009 (Cth). If you have questions about the type of conduct



or concerns that are covered by this Policy and may qualify for statutory protection, you should direct them to the Whistleblower Service or a Whistleblower Protection Officer (as described in section 4 below) or seek independent legal advice.

3.3 All Group team members (including former team members), service providers and suppliers (and their current and former employees) may make use of this Policy and associated Whistleblower Service. A family member of any of these persons may also use this Policy.

3.4 This Policy is not intended to cover personal workplace grievance issues that you may have, including:

- an interpersonal conflict between you and another team member;
- a decision relating to your engagement, transfer or promotion;
- a decision relating to the terms and conditions of your employment; and
- a decision to suspend or terminate your employment, or otherwise to discipline you.

3.5 Complaints of this nature should be reported through the Workplace Grievance Policy or the Workplace Treatment Policy. Nothing in this Policy is intended to remove or dilute the People & Communications team's responsibility to investigate or deal with grievances that are covered by existing People & Communications policies. However, this Policy recognises that there may be circumstances where such issues are of an extent or of such a serious nature that they move beyond individual grievances. Where this is the case, your report will be treated as a concern reported under this Policy and handled in accordance with this Policy. Where there is any doubt as to the correct reporting route or if you are not comfortable raising people related issues through the People & Communications frameworks, you should call the Whistleblower Service for further information. If you are a franchisee team member and your concern relates to a franchisee in the 7-Eleven Network, the following dedicated services are available for employee support:

- To raise wage-related concerns about any franchisee in the 7-Eleven network you may anonymously contact the 7-Eleven Wage Claims Program by email at 7elevenWCP@7eleven.com.au or via the internet at www.7eleven.com.au/wageclaimsprogram.
- To raise any issue or concern in regard to misconduct, unethical and illegal activity by a franchisee in the 7-Eleven Network please get in contact with the 7-Eleven Franchisee Team Member Helpline on 1800 711 243 or by email at 7elevenhelpline@erstrategies.com.au

3.7 For further information about these franchisee employee helplines, please refer to the Franchisee Team Member Handbook. Reports made to these helplines will be handled in accordance with the policies and procedures which apply to the helplines.



- 3.8 For concerns that relate to health and safety or environmental risks, these should be reported through:
- for health and safety issues, Charles Griffin, Workplace Health and Safety Manager by email at cvg@7eleven.com.au
 - for environmental issues, Grant Bourne, Operational Risk Team Leader by email at grant.bourne@7eleven.com.au

4 PROCEDURE FOR RAISING A CONCERN

4.1 This Policy is designed to complement the normal communication channels between people leaders and team members. You are encouraged to report matters to any of your line managers. If for whatever reason you don't think you can, or you believe your reported concern has not be appropriately dealt with or you are seeking statutory protection in relation to your report, you should use one of the avenues provided below. Each of the avenues described below provide services or perform roles where it is their responsibility to receive reports that qualify for statutory protection and the protections under this Policy. However, you should be aware that if you make a report via one of the mechanisms that is external to the Group (for example those identified at sections 4.1.5, 4.1.6 or 4.1.7 below), your report will **not** be handled in accordance with this Policy. If you have any concerns or questions on the procedure for raising a concern, you should contact a Whistleblower Protection Officer identified below. The whistleblowing channels are:

4.1.1 Whistleblower Service

You may call 1800 667 471 during ordinary business hours for a service operated by an external and independent professional services organisation, with employees who are trained in confidential reporting and whistleblower protection. This may be a useful channel in circumstances where your report concerns the Whistleblower Protection Officer or a senior manager, or an alleged breach of this Policy. Alternatively, you can complete the encrypted webform at <https://erstrategies.com.au/7-eleven-whistleblower-form/> which also allows for anonymous disclosures.

4.1.2 Whistleblower Protection Officers (WPOs)

- James Wyatt - General Counsel by email at juw@7eleven.com.au
- David Gorton - Risk and Compliance Area Leader by email at dvg@7eleven.com.au

These WPOs are specially trained internal resources that are responsible for administering this Policy. They are best placed to ensure your report is properly investigated, and your identity protected during the process. You can contact a WPO by using the above email address and should include in your email subject heading that you are making a report under this Policy.



4.1.3 Senior Managers / Whistleblower Contact

You can also make a report to any member of the Group's senior leadership team, but the best placed officers for receiving reports is:

- Sharon Beaumont – General Manager, People, Communications and Safety by email at slb@7eleven.com.au

(known as the **Whistleblower Contact**).

You can contact the Whistleblower Contact by using the above email address and should include in your email subject heading that you are making a report under this Policy.

4.1.4 Regulatory bodies

Nothing in this Policy is intended to restrict you from reporting a concern, providing information to, or communicating with a law enforcement body or a regulator such as ASIC, APRA, the AFP, ATO, Commissioner or Taxation or any other Commonwealth regulatory body prescribed by the Corporations Act and Tax Administration Act.

4.1.5 Public interest and emergency disclosures

You can also make a public interest disclosure or emergency disclosure to a journalist or members of Commonwealth, State or Territory parliaments in certain circumstances and qualify for protection under the Corporations Act. To qualify for protection, a disclosure must have previously been made to ASIC, APRA or another prescribed body and written notice provided to the body to which the disclosure was made. In the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure. Before you make a disclosure of this nature, you should contact an independent legal advisor to obtain advice about the relevant requirements for these type of disclosures to ensure you can meet them.

4.1.6 Legal practitioners

You can also report a concern to a legal practitioner for the purpose of obtaining legal advice or representation in relation to the operation of the whistleblower provisions in the Corporations Act (even if the legal practitioner advises you your report does not ultimately qualify for statutory protection).



4.2 When you make a report, you can choose not to identify yourself. This option applies at the time of making your report, over the course of any investigation undertaken in accordance with section 5 below and even after an investigation is finalised. You can also refuse to answer questions that you feel may reveal your identity at any time during the investigation process, including during any follow up conversations. Statutory protection and protection under this Policy still applies to anonymous reports. Other steps the Group will take in practice to protect your anonymity include, by way of example: communicating with you on an anonymous basis including via the Whistleblower Service;

- communicating with you using any anonymised email address that you provide as a means of two-way communication;
- allowing you to adopt a pseudonym for the purposes of making a report.

4.4 However, anonymous reports (including where you refuse to provide, or do not provide, a means of contacting you during the investigation process), make the investigation process more difficult and the Group encourages you to disclose your identity so that your report can be investigated more thoroughly and ensure you are supported and protected.

INVESTIGATION PROCEDURES

5.1 Reports made under this Policy (including to the Whistleblower Service) will be shared with the Whistleblower Panel (comprising the Whistleblower Protection Officers ('WPO's) and the Whistleblower Contact) (**Whistleblower Panel**) except to the extent that a report relates to one or more of the WPO's or Whistleblower Contacts, in which case the report will not be shared with that person or persons. The Whistleblower Panel will assess the concern(s) raised and recommend a course of action, including by way of example, if your report qualifies for statutory protection and requires a formal of investigation. By raising a concern under this Policy, you consent to the details of your report, including your name (unless you elect to remain anonymous) being shared with the Whistleblower Panel for this purpose. Whilst all matters raised will be treated by the Whistleblower Panel in a secure and sensitive nature with appropriate confidentiality, not all of them will proceed to investigation.

5.2 The day to day operations of the Whistleblower Panel are managed by the Group's Risk and Compliance Team with direct oversight and reporting lines to the Chair of the Group's Audit, Compliance and Risk Committee. Members of the Whistleblower Panel (and investigators appointed by the Panel) must only report on specific matters to others within the Panel. This reporting requirement overrides their normal reporting lines, including in relation to the investigation of any wrongdoing reported.



- 5.3 Where it is determined by the Whistleblower Panel that a report should be investigated, the investigation processes will vary depending on the precise nature of the conduct being investigated. The Whistleblower Panel will assess who is a suitable person or persons to conduct an investigation into the concern(s) raised. In some circumstances, the investigator appointed may be external to the Group or may seek assistance on task or aspects of an investigation from internal or external resources where appropriate to support the investigation. Those investigators and resources operate under the same confidentiality obligations as the lead investigator.
- 5.4 The Group aims to start the investigation within two weeks of disclosure in some circumstances and you may be asked to provide more information during the course of the investigation.
- 5.5 All investigations must be conducted in a manner that is fair, objective and affords natural justice to all people involved. A matter will not be investigated by someone who is personally implicated in the concern so as to create a conflict of interest.
- 5.6 Following an investigation, the investigator may produce, or require the production of an investigation report. Circulation of any investigation report (while preserving confidentiality in accordance with the Policy and legislative requirements where required) will be restricted to individuals who will be involved in determining any action to be taken.
- 5.7 Wherever possible, you will be kept informed of the progress of the investigation. The frequency and detail of any updates will depend on the nature of the concern you have reported and the contact information you provide. Typically, you will be contacted through the channel you used for making the report (including through anonymous channels). As a general rule, you will be informed of the results of an investigation as soon as the investigation is finalised and acted upon. However, in some circumstances, privacy, confidentiality or other constraints may limit the feedback that can be provided to you.
- 5.8 Where illegal conduct has occurred, matters may be reported to relevant authorities.

6 SUPPORT FOR WHISTLEBLOWERS

- 6.1 The Group enforces a strict policy against retaliation and detrimental treatment of individuals who make a report under this Policy where there are reasonable grounds for the report. No one may threaten you or take action against you for raising questions, reporting or proposing to report concerns to any supervisor, line manager, or via any of the avenues set out in section 4 above where you have a reasonable basis for raising the concerns or questions.
- 6.2 No team member who raises genuinely held concerns will be subjected to any detrimental treatment as a result of such action, even if the concern turns out to be unfounded.



- 6.3 Detrimental treatment includes dismissal, demotion, discrimination, harassment, intimidation, disciplinary action, bias, threats or other unfavourable treatment because you made or proposed to make a report about your concerns.
- 6.4 Detrimental treatment does not include reasonable administrative action (for example, moving your work location away from another individual the subject of your report) or managing unsatisfactory work performance in line with the Group's performance management framework.
- 6.5 Examples of measures the Group will take to support and protect you from detriment include:
- assisting you to develop strategies to help minimise or manage stress or other challenges that may result from making a report or any subsequent investigation;
 - considering whether you can perform your duties from another location or making other modifications to the way you perform your work duties; and
 - considering conducting a risk assessment to manage the risk of you being subjected to detrimental treatment.
- 6.6 If you believe that you are being subject to a detriment within the workplace as a result of raising concerns under this Policy, you should inform the Whistleblower Contact immediately (except to the extent your concern relates to the Whistleblower Contact, in which case it should be raised with the WPO).
- 6.7 A person who subjects you to detrimental treatment because you have made, or propose to make a report, will be in breach of this Policy and will be dealt with under the Group's disciplinary procedures. This is a serious matter which can expose the person to civil and criminal sanctions under the legislation discussed in section 10 below.
- 6.8 If you have any further questions about these protections, you should contact a WPO, Whistleblower Contact or otherwise seek independent legal advice. You can also contact a regulatory body such as ASIC, APRA or the ATO if you believe you have suffered detriment.
- 6.9 The Group is also committed to ensuring providing appropriate support to you if you make a report. The nature of the support that may be offered will depend on the content of your report and your personal circumstances. Examples of support that may be provided to you including accessing the Group's Employee Assistance Program, supporting you make an anonymous disclosure, handling your report on a confidential basis in accordance with this Policy and undertake a fair and object investigation process in accordance with this Policy.
- 6.10 Additionally, the Group is committed to ensuring the fair treatment of any whistleblower or any officer or team member who is mentioned in a report made pursuant to this Policy by:
- maintaining the confidentiality of information contained in reports made in accordance with the requirements of this Policy;



- applying the investigation procedures outlined above; and
- providing access to People, Communications and Safety Team support or relevant policies – e.g. Workplace Grievance Policy or the Workplace Treatment Policy.

7 CONFIDENTIALITY

- 7.1 The WPOs and the Whistleblower Contact will ensure that your identity, and the information in your report remains confidential. In fact, the Group has a legal obligation to protect your identity if you make a report under this Policy that qualifies for statutory protection.
- 7.2 If you disclose your identity, the only people who will know your details will be the recipient under this Policy to whom you made your report, the Whistleblower Panel, and any investigator assigned by the Whistleblower Panel to conduct the investigation (including resources the investigator involves as referred to in section 5.2). By making a report you consent to your identity being shared with the investigator for the purpose of conducting an investigation under this Policy so you should inform the recipient of your report under this Policy if you do not want this to occur. Nobody else will be informed of your identity unless:
- the Group is legally obliged to disclose your identity;
 - disclosure is necessary for some emergency; or
 - you consent to the disclosure.
- 7.3 There may be circumstances where the contents of your report can be disclosed without your consent. This includes circumstances where the information does not disclose your identity, the Group has taken all reasonable steps to reduce the risk you will be identified from the information and it is reasonably necessary for investigating the issues raised in your report.
- 7.4 The information you provide will also be held securely. There may be an electronic record kept by the Group to assist in the investigation of your report, but the only additional people that will have access to this are incidental IT specialists who administer the platform. Other steps the Group will take in practice to protect the confidentiality your identity include, but are not limited to:
- redacting, where possible, personal information or references to you witnessing an event;
 - contacting you (where possible) to help identify aspects of your report that could inadvertently identify you; and
 - reminding individuals involved in handling and investigating a report of confidentiality requirements.



7.5 Any unauthorized disclosure of your identity or information that is likely to lead to your identification, or the substance of your report will be a breach of this Policy and will be dealt with under the Group's disciplinary procedures. You should consider the Escalation Procedure heading below. It may also be an offence subject to penalties under the Corporations Act or Tax Administration Act. In addition to being able to make a complaint under this Policy in relation to a breach of your confidentiality, you can also make a complaint to a regulator including, for example, ASIC or APRA.

8 FALSE DISCLOSURES

8.1 Reporting concerns has the potential to damage the career prospects and reputation of people who are the subject of allegations. If your report is found to be malicious, deliberately misleading or frivolous, you may be subject to disciplinary action.

9 ESCALATION PROCEDURE

9.1 If you are not satisfied with the response you have received under this Policy you should raise the matter with the Chair of the Group's Audit, Compliance and Risk Committee outlining your reasons:

- Sandra Birkenleigh - Group Independent Director by email at sbirkenleigh@gmail.com

10 STATUTORY PROTECTIONS

10.1 Both the Corporations Act and the Taxation Administration Act provide special statutory protections for eligible whistleblowers who make a disclosure which qualifies for protection under each Act.

10.2 To be protected under legislation, you must make a report that meets the requirements of the relevant legislation.

10.3 Your report will qualify for the protections outlined below under the Corporations Act if you are a person to whom this Policy applies and:

10.3.1 you have reasonable grounds to suspect that the information you are reporting concerns:

- misconduct or an improper state of affairs relating to the Group;
- constitutes an offence or contravention under certain nominated legislation; or
- represents a danger to the public or the financial system; and



10.3.2 you make your report directly to:

- ASIC;
- APRA;
- the auditor of 7-Eleven or Convenience Holdings, or a member of an audit team conducting an audit of the relevant entity;
- a director, company secretary or senior manager of 7-Eleven or Convenience Holdings;
- a WPO, Whistleblower Contact or the Whistleblower Service;
- a legal practitioner for the purpose of obtaining legal advice or representation in relation to the operation of the whistleblower provisions; or
- those individuals permitted to receive a public interest or emergency disclosure in accordance with the requirements of the Corporations Act.

10.4 The protections available under the legislation to an individual who meets the requirements above include (in accordance with the provisions of that legislation):

- the right to have their identity protected;
- the right to have information provided as part of the disclosure handled in accordance with the provisions of that legislation;
- the right to be protected from civil, criminal or administrative liability (including disciplinary action) for making the disclosure; from contractual or other remedies on the basis of the disclosure; and from the admissibility of the information provided in evidence against the person;
- the right to be protected from detrimental treatment or any form of victimisation;
- the right to compensation and other remedies (including a right not to be required to pay costs incurred by another person when litigation is commenced); and
- the right not to be required to disclose their identity before any court or tribunal.

10.5 You should be aware that the protections outlined above do not grant immunity for any misconduct you have engaged in that is revealed in your report.

10.6 The protections apply from the time you make a report is made irrespective of whether you make a report internally (for example, to the WPO) or externally (for example to the Whistleblower Service) or to a legal practitioner, regulatory body or a public interest or emergency disclosure in accordance with the requirements of the Corporations Act. Additionally, you may still qualify for these protections even if your report turns out to be incorrect.



- 10.7 You may also be eligible to seek compensation and other remedies if you suffer loss, damage or injury in specific circumstances. For example, because the Group failed to take reasonable precautions to prevent detrimental treatment suffered by you. The Group encourages you to seek independent legal advice in these circumstances, or contact ASIC, APRA or the ATO.
- 10.8 If you have any further questions about these protections you should contact one of the WPOs.
- 10.9 The Taxation Administration Act also provides protection for disclosures of information that indicates misconduct or an improper state of affairs, in relation to the tax affairs of an entity in the Group where you consider the information may assist the recipient to perform their functions or duties in relation to the tax affairs of that particular entity.
- 10.10 Protection is provided for disclosures made to the Australian Tax Office, Commissioner of Taxation, to any registered tax agent or BAS agent providing tax agency or BAS services to any Group entity or any person or agency specified in 10.3.2 above.
- 10.11 The protections available to you if you make a report under the Taxation Administration Act are the same as those outlined above in section 10.4.

11 AVAILABILITY OF POLICY

- 11.1 This Policy is available to all officers and team members of the Group through the People, Communications and Safety page via the 7-Eleven intranet.
- 11.2 This Policy is also available to external parties via the 7-Eleven internet page.

12 ADMINISTRATION OF THIS POLICY

12.1 Review

This Policy will be reviewed. This is so the Policy remains consistent with applicable standards and relevant legislative requirements and well as the changing nature of the Group.

12.2 Training

Specialist training is mandatory for the employees responsible for key elements of the program. The People Centre of Excellence function are responsible for overseeing the development and delivery of effective training regarding the program.



13 WHISTLEBLOWER CONTACT DETAILS

13.1 Contact Details

The key Whistleblower contacts defined in this Policy include:

Role	Name/Entity	Contact Details
External Independent professional whistleblower services organisation		
Store Network Concerns (including wage concerns) 7-Eleven Franchisee Team Member Helpline	ER Strategies	Ph: 1800 711 243 Note: Available during ordinary business hours Internet: 7elevenhelpline@erstrategies.com.au
7-Eleven Whistleblower Service	ER Strategies	Ph: 1800 667 471 Note: Available during ordinary business hours
Whistleblower Panel Members		
Whistleblower Protection Officer	James Wyatt, General Counsel	Email: juw@7eleven.com.au
Whistleblower Protection Officer	David Gorton, Risk and Compliance Area Lead	Email: dvg@7eleven.com.au
Whistleblower Contact	Sharon Beaumont, General Manager, People, Communications and Safety	Email: slb@7eleven.com.au
Audit, Compliance and Risk Committee Chair		
Group Independent Director	Sandra Birkenleigh	Email: sbirkenleigh@gmail.com



14 APPROVAL & REVIEW

Document Control	
Policy Owner	Risk and Compliance Team Lead, Finance
Review Committee	7-Eleven's Whistleblower Panel and the Audit, Compliance and Risk Committee

Version Control			
Version Number	Date Issued	Author	Amendment(s)
V1	05-07-2019	Risk and Internal Audit Manager	First published version
V2	18-11-2020	Head of Risk and Assurance	Second published version
V3	3/12/2021	Risk and Compliance Area Lead	Draft Third published version