



Code of Business Principles Non-Retaliation Guidance



Our Living the Code Policy states that **no one must retaliate against those who report a potential or actual breach**. This guidance document outlines what that means in more detail.

The phrase “those who report a potential or actual breach” includes those that:

- seek guidance on our COBP to determine whether someone should or should not report a breach, or
- report suspected, potential and actual breaches of our COBP, or
- support COBP investigations through agreeing to be interviewed or providing documents that support the facts of a particular matter being investigated

We expect the highest standards of ethical conduct from all our employees and are committed to upholding our reputation for doing business with integrity and with respect for all those with whom we interact. We believe that operating in an open and transparent manner is critical for maintaining our integrity. Thus no one should experience retaliation due to “speaking up” in any way or for cooperating with an investigation.

We start from the principle that all potential COBP matters are raised in good faith i.e. the employee “speaking up” and raising the matter is based on an honest belief that the information they are providing is truthful and that they genuinely believe that there could be a COBP breach. If, however it comes to light that an employee has not acted in good faith then this is in itself a breach of the COBP and the matter will be investigated accordingly. Even if an employee is not acting in good faith it is not appropriate for anyone else to retaliate, the issue will be dealt with through a COBP investigation and formal sanctions will be given.

Thus, there are never any circumstances where retaliation is appropriate, acceptable or tolerated.

Any **attempted or actual retaliatory action** by any employee will be considered to be a breach of the Code of Business Principles and thus the employee or employees involved in such activities will be subject to sanctions as outlined in the Business Integrity Sanctions Standard. In addition, if you become aware that retaliation is occurring, with respect to a COBP matter, in which you have not been involved but of which you are aware, then you are also duty bound under the Living the Code Policy to report the matter.

Unfortunately, retaliation can come in many different forms, and it is impossible to write a fully comprehensive list but for the avoidance of doubt it could include:

- Aggressive and threatening behaviour
- Making inappropriate remarks about the employee, their family or friends
- Ignoring the employee
- Changing the nature of the work to be performed by the employee
- Performance downgrades
- Not providing a true representation of the facts or tampering with evidence
- Unfair pay
- Preventing promotion
- Instigating a false COBP Case