

# **JB Hi-Fi Group**

# **Reportable Misconduct and Whistleblower Policy**

v.3 28 July 2020



## 1. Objective

JB Hi-Fi Group recognises that the way we conduct ourselves directly contributes to the success of our businesses and shapes our brand and reputation.

The JB Hi-Fi Group's Statement of Values includes statements that we will:

- act honestly and do the right thing;
- act lawfully, ethically and responsibly;
- call things out that aren't right;
- treat everyone fairly and without discrimination; and
- ensure our business is safe, inclusive and welcoming for everyone.

Reportable Misconduct is conduct which contravenes the Group's Code of Conduct, Values, Policies or the law.

The purpose of this Policy is to encourage Employees to report concerns of Reportable Misconduct and give assurance that they will be protected from detrimental treatment in reporting a matter of concern.

This Reportable Misconduct and Whistleblower Policy outlines:

- what is considered to be "Reportable Misconduct";
- the internal and external reporting channels through which disclosures can be made;
- how confidentiality, fairness and protections against detrimental treatment are provided for;
- how disclosures of Reportable Misconduct are treated and investigated; and
- the consequences of breaching this Policy.

## 2. Application

This Policy applies to the JB Hi-Fi and The Good Guys businesses and to JB Hi-Fi Solutions & The Good Guys Commercial ("the Group"). It applies to anyone who works for the Group in any capacity including Directors of the Group, former employees, suppliers of goods and services and their employees, as well as spouses, children or dependents of any of these people ("Employees").

Customers and the general public are not covered under the scope of this Policy.

## 3. Reportable Misconduct

Reportable Misconduct may or may not involve a breach of law. Reportable Misconduct includes, but is not limited to:

- Dishonest, corrupt or illegal activities;
- Fraud or misappropriation;
- Failure to provide safe working conditions for workers;
- All forms of forced, bonded, child, or involuntary labour and human trafficking;
- Failure to comply with applicable laws and regulations;
- Conflicts of interest;
- Negligent or unconscionable business practices;
- A breach of the Group Code of Conduct;
- Conduct which may cause financial loss, or be detrimental to the Group or any of its Employees;
- Seriously inappropriate or unethical conduct;
- Misconduct involving senior managers, having the potential to significantly impact the Group;
- Adverse impact or damage to the environment; and
- Deliberate concealment of any of the above.

Reportable Misconduct is unacceptable to the Group. Employees are encouraged to report any actual or suspected Reportable Misconduct, where there are reasonable grounds to suspect that it has or will occur.

Personal work-related grievances such as interpersonal conflicts, decisions relating to transfers, promotions or terms of employment, or disciplinary matters, are not included within the scope of this Policy and are governed by separate HR Policies and Procedures. A personal work-related grievance may still qualify for protection if it involves Reportable Misconduct, or if the discloser suffers detrimental treatment as a result of a disclosure. If unsure, an Employee is encouraged to seek clarification from one of the Whistleblower Reporting Officers listed within this Policy.

## 4. Making a Disclosure

An Employee must have reasonable grounds to suspect that Reportable Misconduct has taken place before making a disclosure.

Various channels are open to Employees wishing to make a disclosure of Reportable Misconduct. Whichever channel is used disclosures may be made anonymously if requested.

Prior to making a disclosure, an Employee may seek advice through any one of the internal or external reporting channels identified below.

### 4.1 Internal Channels

Employees are encouraged to make a disclosure directly to one of the following persons:

- A Whistleblower Reporting Officer;
- A JB Hi-Fi Group Executive Director;
- A JB Hi-Fi Limited Non-Executive Director;
- A JB Hi-Fi Executive Director; or
- A Good Guys Executive Director.

Further details on who these individuals are and how to contact them, are included in Appendix 1 of this Policy. The role of these persons is to receive the disclosure of Reportable Misconduct and determine the steps to investigate if required. There will be circumstances where the Reporting Officer may be involved in an investigation where it is deemed appropriate.

### 4.2 External Channels

It is recognised that in some circumstances an Employee may prefer to report their concern to an external party. In these circumstances, Employees may make a disclosure via Stopleveline (JB Hi-Fi) or Your Call (The Good Guys).

	Telephone	Mail	Email / Online
<b>JB Hi-Fi</b>	<b>Stopleveline</b> 1300 30 45 50 (Australia) 0800 42 50 08 (New Zealand) From Overseas (+613 9811 3275) 24 hours, 365 days a year	JB Hi-Fi Group C/- Stopleveline Locked Bag 8 Hawthorn Vic 3122	<a href="mailto:jbhifi@Stopleveline.com.au">jbhifi@Stopleveline.com.au</a> <a href="mailto:jbhifinz@Stopleveline.co.nz">jbhifinz@Stopleveline.co.nz</a> <a href="https://jbhifi.stoplينereport.com">https://jbhifi.stoplينereport.com</a> Download the smart phone APP – search for 'stopleveline247' for iPhone or Android.
<b>The Good Guys</b>	<b>Your Call</b> 1800 940 379 (Australia) 9am – 12am AEST From Overseas (+613 9895 0012) Message bank 24 hours, 365 days a year	The Good Guys C/-Your Call Locked Bag 7777 Malvern Vic 2144	<a href="http://www.yourcall.com.au/report">www.yourcall.com.au/report</a> using The Good Guys code TGGG1959 or <a href="mailto:tgg@yourcall.com.au">tgg@yourcall.com.au</a>

Details of the disclosure will, if appropriate, be forwarded to a Reporting Officer for further assessment, although the identity of the Employee making the disclosure will not be revealed by Stopleveline or Your-Call where a request for anonymity has been made.

Disclosure of reportable misconduct through one of these reporting channels is encouraged in the first instance. However, the Group recognises that protected disclosures may be made through other avenues such as through a legal practitioner, regulatory body (such as ASIC), or to a journalist or a member of parliament in the case of public interest or emergency disclosures. Public interest disclosures and emergency disclosures are particular disclosures where a disclosure has previously been made to a regulatory body such as ASIC or APRA. Employees wishing to make a public interest disclosure or an emergency disclosure should contact an independent legal adviser before doing so.

## 5. Protections

The following section outlines the protections available to Employees for disclosures of reportable misconduct. Disclosures of misconduct outside the scope of this Policy (for example, personal work-related grievances) do not qualify for protection under the Corporations Act but may be covered by protections under other relevant legislation. If unsure, employees are encouraged to seek advice and clarification via the Group's internal or external reporting channels.

It is important to note that a discloser can still qualify for protection even if the disclosure turns out to be incorrect.

## 5.1 Detrimental treatment

The Group is committed to ensuring that any Employee who makes a genuine disclosure of Reportable Misconduct under this Policy is not disadvantaged, victimised or subject to detrimental treatment. This commitment extends to anyone who acts as a witness or participates with respect to a disclosure. Examples of how the Group will protect against detrimental treatment may include engaging the Group's Appointed Protections officer to conduct a risk assessment and taking steps to minimise the potential risks of detrimental treatment.

## 5.2 Confidentiality and anonymity

Unless otherwise required by law, a recipient of a disclosure of Reportable Misconduct is obliged to ensure that both the details of a disclosure, and the identity (and any information that may lead to the identification) of the Employee making a disclosure, is kept confidential and only made available to persons who have been appointed to investigate the matter.

Anonymous disclosures are afforded the same protections under the Corporations Act as disclosures where the discloser's identity has been provided.

Unless otherwise required by law, the identity of an Employee requesting anonymity must not be disclosed to the persons investigating the matter. Examples of how the Group will uphold confidentiality and anonymity may include redacting of personal information, communicating via anonymous hotlines, referring to the discloser in a gender-neutral context and ensuring appropriate controls are established to access confidential information.

Anonymous disclosures may inhibit the speed and effectiveness of an investigation, due to the inability to provide feedback, or to gather additional information from the person who has made the disclosure. In some cases, it may be difficult to advance an investigation if further information cannot be obtained.

## 5.3 Compensation and other remedies

An Employee eligible to make a disclosure under this Policy may be eligible to seek compensation or remedies through the courts if they suffer loss, damage or injury because of a disclosure, or if reasonable steps were not taken to prevent detrimental conduct. If unsure, Employees are encouraged to seek advice through the Group's internal or external reporting channels.

## 5.4 Civil, criminal and administrative liability protection

An Employee eligible to make a disclosure under this Policy may be afforded protection from civil, criminal and/or administrative liability as a result of making a disclosure. If unsure, Employees are encouraged to seek advice through the Group's internal or external reporting channels.

## 5.5 Appointed Protection Officer

Employees should report any concerns relating to detrimental treatment or breaches of confidentiality to the persons listed in Section 4.1 and Appendix 1. However, the Group has also appointed a Protection Officer whose role is to protect an Employee making (or participating in making) a disclosure under this Policy from any actual or threatened detrimental treatment and provide support and advice with respect to that Employee's rights and obligations.

The Protection Officer will be informed of all Whistleblower disclosures and discharge their duties independent of any potential or ensuing investigative action.

The appointed Protection Officer is listed in Appendix 2 of this Policy, with a delegate to be appointed in their absence.

## 6. Investigation Process

The Group takes all disclosures of Reportable Misconduct seriously. All disclosures will be assessed to decide the appropriate action to take, including whether the disclosure qualifies for protection and whether further investigation is required. If an investigation is required, a suitably qualified and independent person will be appointed to investigate the matter. Any Employee involved in the Reportable Misconduct will be excluded from conducting the investigation.

All investigations will be conducted in a way that ensures fairness and objectivity to both the Employee making the disclosure, and the business units and persons subject to the investigation.

## 6.1 Timing

The time taken to address and resolve a report will depend on the complexity of the matters disclosed. In some instances, extensive inquiries and evidence gathering may be required before an investigation is concluded and remedial action taken if necessary.

## 6.2 Communication

Subject to the considerations of confidentiality and it being appropriate and lawful to do so, the progress and outcome of an investigation will be communicated to the Employee who made the disclosure.

## 6.3 Reporting

Once an investigation is concluded the Whistleblower Protections Officer and relevant members of the Group Executive will review the case and determine: (1) what level of reporting is appropriate including consideration whether the matter should be reported to the executive team and/or board; and (2) what action should be taken to address any identified issues.

## 7. Training

The Group will ensure that all relevant employees receive training with regards to this policy including how to respond to disclosures of Reportable Misconduct.

## 8. Policy Breach Consequences

The following conduct will be a serious breach of this Policy:

- Deliberately making a false disclosure of Reportable Misconduct;
- Breaching confidentiality, by sharing information about a disclosure to persons outside of the investigation; and
- Subjecting or threatening to subject an Employee who has made a genuine report under this Policy to detrimental treatment.

All breaches will be subject to appropriate disciplinary action, up to and including termination of employment.

Some breaches may also constitute an offence under the law. In addition to the action that may be taken by the Group under this Policy, any Reportable Misconduct may be referred to a relevant law enforcement and/or regulatory bodies, if deemed to be warranted or if the law requires it.

An Employee making a genuine disclosure of Reportable Misconduct under this Policy will not be considered to have breached confidentiality provisions under their employment contract or agreement in relation to the information disclosed.

## 9. Policy Administration and Compliance

The Group will conduct periodic reviews of this Policy and may also conduct audits of the associated operating procedures to ensure disclosures of Reportable Misconduct are being appropriately recorded, investigated and responded to.

This Policy is made available on JB Hi-Fi's and The Good Guys company intranets and investor website.

## Appendix 1: Persons to which disclosures of Reportable Misconduct can be made:

### Whistle blower Reporting Officers:

Company	Name	State	Contact Details
JB Hi-Fi and The Good Guys (Group)	Michelle Black General Manager, Business Improvement and Assurance	Support Office and all States	<a href="mailto:michelle.black@jbhifi.com.au">michelle.black@jbhifi.com.au</a> (+613) 8530 7586
JB Hi-Fi	Cate Pigeault Human Resources General Manager	JB Hi-Fi Support Office and all States	<a href="mailto:Cate.pigeault@jbhifi.com.au">Cate.pigeault@jbhifi.com.au</a> (+613 8530 7957)
	Jo Manley Senior Risk Analyst	JB Hi-Fi Support Office and all States	<a href="mailto:jo.manley@jbhifi.com.au">jo.manley@jbhifi.com.au</a> (+613) 8530 7414
	Ronald Tan Senior Risk Analyst	JB Hi-Fi Support Office and all States	<a href="mailto:ronald.tan@jbhifi.com.au">ronald.tan@jbhifi.com.au</a> (+613) 8530 7927
The Good Guys	Elissa Vomero Human Resources General Manager	TGG Support Office and all States	<a href="mailto:elissavomero@thegoodguys.com.au">elissavomero@thegoodguys.com.au</a> (+613 9330 5391)
	Sandra Biberow Business Assurance Manager	TGG Support Office and all States	<a href="mailto:sandrabiberow@thegoodguys.com.au">sandrabiberow@thegoodguys.com.au</a> (+613) 9933 5705
	Brandon Lee Senior Forensic Auditor	TGG Support Office and all States	<a href="mailto:brandonlee@thegoodguys.com.au">brandonlee@thegoodguys.com.au</a> (+613) 9933 5470

### JB Hi-Fi Group Executive Directors

Company	Name	Contact Details
JB Hi-Fi and The Good Guys (Group)	Richard Murray Group Chief Executive Officer	<a href="mailto:richard.murray@jbhifi.com.au">richard.murray@jbhifi.com.au</a> (+613) 8530 7310
	Lynda Blakely Group Human Resources Director	<a href="mailto:lyndablakely@thegoodguys.com.au">lyndablakely@thegoodguys.com.au</a> (+613) 9330 5350
	Tim Carter Group Supply Chain and Commercial Director	<a href="mailto:tim.carter@jbhifi.com.au">tim.carter@jbhifi.com.au</a> (+613) 8530 7512
	Simon Page Group Technology Director	<a href="mailto:simon.page@jbhifi.com.au">simon.page@jbhifi.com.au</a> (+613) 8530 7495
	James Saretta Strategy Director	<a href="mailto:james.saretta@jbhifi.com.au">james.saretta@jbhifi.com.au</a> (+613) 8530 7918
	Andy Ellis Group Commercial and Communications Director	<a href="mailto:andy.ellis@jbhifi.com.au">andy.ellis@jbhifi.com.au</a> (+613) 8530 7658
	Doug Smith Group General Counsel and Company Secretary	<a href="mailto:doug.smith@jbhifi.com.au">doug.smith@jbhifi.com.au</a> (+613) 8530 7550
	Nick Wells Group Chief Financial Officer	<a href="mailto:nick.wells@jbhifi.com.au">nick.wells@jbhifi.com.au</a> (+613) 8530 7456

### JB Hi-Fi Limited Non-Executive Directors

Company	Name	Contact Details
JB Hi-Fi and The Good Guys (Group)	Stephen Goddard	If you wish to submit a Whistleblower disclosure directly to a non-executive director, please email: <a href="mailto:whistleblowerdisclosure@jbhifi.com.au">whistleblowerdisclosure@jbhifi.com.au</a> , with the following in the email title: <i>'Attention: Insert name of non-executive director, Whistleblower disclosure'</i>
	Beth Laughton	
	Mark Powell	
	Richard Uechtritz	
	Melanie Wilson	

**JB Hi-Fi Brand Executive Directors:**

Company	Name	Contact Details
JB Hi-Fi	Cameron Trainor Managing Director	<a href="mailto:cameron.trainor@jbhifi.com.au">cameron.trainor@jbhifi.com.au</a> (+613) 8530 7459
	Justin Buxton Merchandise Services Director	<a href="mailto:justin.buxton@jbhifi.com.au">justin.buxton@jbhifi.com.au</a> (+613) 8530 7317
	Peter Green Store Operations Director	<a href="mailto:peter.green@jbhifi.com.au">peter.green@jbhifi.com.au</a> (+613) 8530 7415
	Cherie Kerrison Managing Director JB Hi-Fi New Zealand	<a href="mailto:Cherie.kerrison@jbhifi.com.nz">Cherie.kerrison@jbhifi.com.nz</a> (+649) 815 4617
	Craig Mackie Merchandise Director	<a href="mailto:craig.mackie@jbhifi.com.au">craig.mackie@jbhifi.com.au</a> (+613) 8530 7449
	Gary Siewert Marketing Director	<a href="mailto:gary.siewert@jbhifi.com.au">gary.siewert@jbhifi.com.au</a> (+613) 8530 7574

**The Good Guys Brand Executive Directors:**

Company	Name	Contact Details
The Good Guys	Terry Smart Managing Director	<a href="mailto:terrysmart@thegoodguys.com.au">terrysmart@thegoodguys.com.au</a> (+613) 9330 5371
	Robert Ambler-Fraser Marketing Director	<a href="mailto:robertamblerFraser@thegoodguys.com.au">robertamblerFraser@thegoodguys.com.au</a> (+613) 93305373
	Biag Capasso Merchandise Director	<a href="mailto:biagcapasso@thegoodguys.com.au">biagcapasso@thegoodguys.com.au</a> (+613) 9933 5460
	Kyle Evans Retail Operations Director	<a href="mailto:kyleevans@thegoodguys.com.au">kyleevans@thegoodguys.com.au</a> (+613) 93306589
	Simon Leigh Merchandise Services Director	<a href="mailto:simonleigh@thegoodguys.com.au">simonleigh@thegoodguys.com.au</a> (+613) 9330 5370

## Appendix 2: Whistleblower Protections Officer

Company	Name	Contact Details
JB Hi-Fi and The Good Guys (Group)	Lynda Blakely Group Human Resources Director	<a href="mailto:lyndablakely@thegoodguys.com.au">lyndablakely@thegoodguys.com.au</a> (+613) 9330 5350