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LOGOS

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# Speak Up Policy

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## 1 What is the purpose of this Policy?

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LOGOS is committed to conducting business honestly, with integrity, and in accordance with its values and standards of expected behaviour. LOGOS has approved this Policy to:

- encourage people to Speak Up if they become aware of Potential Misconduct;
- explain how to Speak Up and what protections a discloser will receive;
- outline LOGOS' processes for responding to Speak Up disclosures; and
- promote a workplace environment in which everyone feels safe, supported and encouraged to Speak Up.

**Speaking Up** means raising a complaint or disclosure in accordance with this Policy.

LOGOS will not tolerate anyone being discouraged from Speaking Up or being disadvantaged or victimised because they want to Speak Up or they have done so. Anyone shown to have disadvantaged or victimised a person because they want to, or have Spoken Up will be subject to disciplinary action, up to and including termination of employment or engagement.

A failure to Speak Up exposes LOGOS to additional risks and will undermine our culture and values.

## 2 What is Speaking Up?

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Speaking Up means telling an appropriate person in a position of influence (examples of these people, called **Recipients**, are provided in section 4) if you have reasonable grounds to suspect that **Potential Misconduct** has occurred or is occurring in relation to LOGOS' business.

Potential Misconduct means any suspected or actual misconduct or improper state of affairs or circumstances in relation to LOGOS. This may or may not include a breach of law or information that indicates a danger to the public or to the financial system. You should Speak Up even if you are unsure if something is Potential Misconduct.

Potential Misconduct does not generally include personal work-related grievances. Personal work-related grievances are grievances relating to your employment that have implications for you personally (such as a disagreement between you and another employee or a decision about your promotion). Generally, these grievances should be raised via the complaint process in LOGOS' Workplace Behaviour Policy to allow these issues to be resolved most effectively. In some cases, these grievances may qualify for legal protection (see Attachment 1).

Examples of Potential Misconduct include for example any of the following including where these are attempted and have been rejected:

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| • breach of laws or regulations;   | • anti-competitive behaviour;                               |
| • criminal activity;   | • victimisation or harassment;                              |
| • bribery, corruption or money laundering;                                     | • unauthorised use of the Group's confidential information; |
| • conduct endangering health and safety, or causing damage to the environment; | • financial fraud or mismanagement/tax evasion;             |

- breaches of LOGOS policies, standards or codes;
- dishonest behaviour;
- conflicts of interest;
- abuses of human rights including occurrences of modern slavery in LOGOS' operations, LOGOS' supply chains or within LOGOS' assets;
- insider trading;
- conduct likely to damage LOGOS' financial position or reputation; and
- deliberate concealment of any of the above.

When Speaking Up you will be expected to act in good faith and have reasonable grounds to believe the information you are disclosing is true, but you will not be penalised even if the information turns out to be incorrect. However, you must not make a report that you know is not true or is misleading. Where it is found that a discloser has knowingly made a false report, this will be considered a serious matter and may result in disciplinary action.

In the event that the subject of your disclosure may also be disclosed pursuant to another LOGOS policy or procedure, the requirements in this policy will prevail.

### 3 Who can Speak Up?

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Anyone with information about Potential Misconduct is encouraged to Speak Up.

This Policy applies to all of LOGOS' current and past:

- employees, officers and contractors;
- suppliers (including employees of suppliers); and
- directors or secretaries of a related body corporate;

and these people's relatives and dependents (or their spouse's dependents).

People must not discourage anyone from Speaking Up and to do so will itself breach this Policy. If any person is told not to raise or pursue a concern, even by their manager or a person in authority, they are encouraged to make a further disclosure to a different Recipient.

### 4 Who can I tell?

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LOGOS encourages you to Speak Up to one of the following **Recipients**:

Recipient Name	Contact details
Group Chief Corporate Officer & Group General Counsel	Natalie Allen E: <a href="mailto:natalieallen@logosproperty.com">natalieallen@logosproperty.com</a> M: +61 4 20 277 827

Recipient Name	Contact details
Group Head of Corporate Affairs & People	Rachel Mornington-West E: <a href="mailto:rachelmornington-west@logosproperty.com">rachelmornington-west@logosproperty.com</a> M: +61 434 604 590
Country Head	The Country Head of the office in which you are employed.

If you do not feel comfortable speaking to a Recipient listed above, you may also speak to your manager. All managers should report disclosures received to a Recipient as soon as practicable to allow procedures to be commenced, which may include an investigation.

Where the disclosure relates to a matter which falls within Appendix 1, managers must not disclose the identity of the discloser or information that could lead to their identification unless the individual provides his/her consent. In all other matters, managers will, where practicable, maintain the confidentiality of the discloser.

Where possible, Recipients will not conduct investigations. The role of Recipients is to ensure that the information is heard by LOGOS and proper follow-up occurs, as well as to ensure you feel supported and protected. Recipients will refer the disclosure to the Group Chief Corporate Officer & Group General Counsel responsible for that country to oversee LOGOS' response. The response and investigation process is set out at sections 7 and 8.

## 5 What information should I provide?

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You should provide as much information as possible, including details of the Potential Misconduct, people involved, dates, locations and if any more evidence may exist.

## 6 Can I make an anonymous disclosure?

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You can make an anonymous disclosure if you do not want to reveal your identity.

Whilst you are encouraged to provide your name because it will make it easier for us to address your disclosure (for example, the context in which you may have observed the Potential Misconduct is likely to be useful information and we may seek more information to assist an investigation) you are not required to do so.

If you do not provide your name, LOGOS will assess your disclosure in the same way as if you had revealed your identity, and any investigation will be conducted as appropriately as possible in the circumstances. However, please be aware that an investigation may not be possible unless sufficient information is provided. You will still be entitled to protections under the law.

Details about how your identity will be protected if you do provide your name are described in section 10.

## 7 How will LOGOS respond?

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LOGOS is committed to ensuring that all disclosures made under this Policy will be received and treated sensitively and seriously, and will be dealt with promptly, fairly and objectively. LOGOS will apply the protections described at section 10 when responding to or investigating disclosures.

LOGOS' response to a disclosure will vary depending on the nature of the disclosure (including the amount of information provided). While Speaking Up does not guarantee that the disclosure will be formally investigated, all reports will be properly assessed and considered by LOGOS and a decision made as to whether they should be investigated.

If appropriate, disclosers will be told how LOGOS has decided to respond to their disclosure, including whether an investigation will be conducted. This may not occur until after an investigation has been concluded. However, it may not always be appropriate to provide disclosers with this information, and it may not be possible unless contact details are provided when Speaking Up.

Any investigations commenced will be conducted in a timely manner and will be fair and independent from any persons to whom the disclosure relates.

All employees and contractors must cooperate fully with any investigations.

Unless there are confidentiality or other reasons not to do so, persons to whom the disclosure relates will be informed of the allegation at an appropriate time, and will be given a chance to respond to the allegations made against them.

The results of any investigation conducted may be recorded in writing in a formal internal report that will be confidential and is the property of LOGOS.

## 8 How will LOGOS ensure fair treatment

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LOGOS understands that being the subject of a disclosure of Potential Misconduct can be distressing. LOGOS is committed to ensuring that all parties are treated fairly in any investigation into a disclosure made. If you are referred to or associated with a disclosure of Potential Misconduct, LOGOS will ensure that you are provided with fair treatment. LOGOS will ensure this occurs on a case-by-case, but such fair treatment will include:

- ensuring that any allegations of Potential Misconduct by an individual are assessed and investigated impartially having regard to the evidence;
- ensuring that you and any other individuals referred to in a disclosure are given an opportunity to respond to those disclosures if appropriate and subject to any confidentiality obligations that may apply;
- where required by law, ensuring that you and any other individuals referred to in a disclosure are given the opportunity to have an appropriate support person present with them in any interview; and
- if you are a current or former employee of LOGOS, you may also request additional support from LOGOS (such as counselling or other support services) if available.

## 9 What happens after an investigation?

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Disclosers who Speak Up will only be informed of the investigation outcome if appropriate. However, it may not always be appropriate to provide disclosers with this information. If appropriate, the persons to whom the disclosure relates will also be informed of the findings of any investigation.

However, any formal report recording the results of an investigation will not be provided to a discloser or any other person subject to investigation.

Where an investigation identifies a breach of LOGOS' internal policies or procedures, appropriate disciplinary action may be taken. This may include but is not limited to terminating or suspending the employment or engagement of the person(s) involved in the misconduct.

## 10 What protections exist for disclosers?

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This section outlines LOGOS' policy on protecting those who Speak Up. The law also contains certain protections for disclosers, which are summarised in the attachments to this Policy.

### 10.1 Protecting your identity

LOGOS' priority is to protect the identity of people who Speak Up. If you Speak Up, the subject of your disclosure, your identity (and any information that we have because of your disclosure that someone could likely use to work out your identity) will only be disclosed if:

- you give your consent to LOGOS to disclose that information;
- the disclosure is allowed or required by law;
- the nature of the disclosure falls outside the protected disclosures listed in the relevant attachment to this policy and the recipient of the disclosure forms the view that exceptional circumstances exist which mean it is reasonable and necessary to disclose this information in order to deal with your disclosure; or
- in the case of information likely to identify you, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out your identity.

### 10.2 Protecting you from detriment

No person may victimise or cause detriment to someone (or threaten to do so) because of knowledge or a suspicion that any person has or will Speak Up. For example, victimisation includes doing or threatening to do something that creates:

- discrimination, detriment or damage to a person's reputation;
- harassment, intimidation or retaliation; or
- demotion or dismissal or loss of opportunity for promotion.

You should tell a Recipient listed in section 4 if you are concerned that you may be, are being, or have been victimised in any way. LOGOS will treat this very seriously.

Any person involved in victimising conduct will be subject to disciplinary action (including but not limited to termination of employment or engagement). In some circumstances, this may also be a criminal offence punishable by imprisonment. LOGOS may refer any person that has engaged in victimising conduct to law enforcement authorities for further investigation.

LOGOS will at all times be able to raise and address with a discloser matters that arise in the ordinary course of their employment or contractual relationship with the LOGOS Group (for example, any separate performance or misconduct concerns).

## 11 Policy Review

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This Policy will be reviewed every two years, or earlier if required.

## Version History

Version	Date	Purpose of Review
1.0	August 2018	Initial Policy
2.0	June 2019	Amendments to reflect further updates to the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2018 in Australia.
3.0	March 2020	Amendments to Potential Misconduct to include where attempted and have been rejected. Addition of CEO of LOGOS in India as a Recipient.
4.0	October 2020	Inclusion in line with the modern slavery policy. Addition of Group Head of Corporate Affairs & People and updating of existing titles.
5.0	April 2023	Period review in conjunction with advice from Herbert Smith Freehills; update 'Recipient' details; include new country-specific schedule for India, South Korea, Malaysia, Vietnam, Indonesia and Japan.

## 12 Further information

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Any questions about this Policy or Speaking Up can be referred to the Chief CCO & Group General Counsel.

A copy of the Policy can be obtained by contacting a representative from Group Legal, Group Compliance or Group HR.

This Policy does not form part of terms of employment and may be amended from time to time.



## Attachment 1

### Protections provided by law – Australia

#### 1 Additional legislative protections

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Additional legislative protections are available for protected disclosers (including current and former employees and suppliers, as well as their relatives and dependants) who report certain information to certain people.

LOGOS encourages you to Speak Up under the Speak Up Policy. However, the law offers some protections in other cases. For example, you can disclose certain information to a longer list of people, beyond the Recipients identified in the Policy.

Protected disclosures and the additional legislative protections are summarised in this attachment. This is a summary and is not comprehensive. If you would like further information about the legislative protections that may apply to disclosures, please contact a Recipient in section 4, who can provide you with further information. If you make a protected disclosure that does not comply with the Speak Up Policy, you may still be entitled to the legal protections as set out below.

#### 2 Protected disclosures

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Certain information that is disclosed to certain people or organisations are protected by law. Examples of this information and recipients are outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
<ul style="list-style-type: none"> <li>Note that “personal work-related grievances” are not protected disclosures under the law, except as noted below.</li> </ul>	
<ul style="list-style-type: none"> <li>Information that may assist the Commissioner of Taxation to perform his or her functions or duties under a taxation law in relation to LOGOS.</li> </ul>	<ul style="list-style-type: none"> <li>Commissioner of Taxation.</li> </ul>
<ul style="list-style-type: none"> <li>Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of LOGOS, which the employee considers may assist the eligible recipient to perform functions or duties in relation to the tax affairs of LOGOS.</li> </ul>	<ul style="list-style-type: none"> <li>An auditor or a member of an audit team conducting an audit of LOGOS.</li> <li>A registered tax agent or BAS agent who provides tax services or BAS services to LOGOS.</li> <li>A director, secretary or senior manager of LOGOS.</li> </ul>

Information reported or disclosed	Recipient of disclosed information
<ul style="list-style-type: none"> <li>The law also protects certain disclosures made in “emergency” and “public interest” situations, in which disclosures can be made to additional recipients. Please contact LOGOS’ Group General Counsel if you would like more information about emergency and public interest disclosures.</li> </ul>	<ul style="list-style-type: none"> <li>An employee or officer of LOGOS who has functions or duties that relate to the tax affairs of LOGOS.</li> </ul>
<ul style="list-style-type: none"> <li><b>Personal work-related grievances</b></li> </ul>	
<ul style="list-style-type: none"> <li>Legal protection for disclosures about solely personal employment-related matters are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if, in summary:               <ul style="list-style-type: none"> <li>It concerns determinant to you because you have or may be considering “Speaking Up”; or</li> <li>It is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about whistleblowers.</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>Under the law, a grievance is not a “personal work-related grievance” if it:               <ul style="list-style-type: none"> <li>Has significant implications for an entity regulated under the law that do not relate to the discloser;</li> <li>Concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;</li> <li>Concerns conduct that represents a danger to the public or financial system; or</li> <li>Concerns conduct prescribed by the regulations.</li> </ul> </li> </ul>	

## 3 Specific protections and remedies

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Additional legislative protections may also be available, including but not limited to:

- compensation for any loss, damage or injury suffered as a result of victimising conduct;
- an injunction to prevent any victimising conduct; and
- if any victimising conduct resulted in the termination of an employee's employment, reinstatement of their position.

The law also states that if you make a protected disclosure:

- in some circumstances (e.g. if the disclosure has been made to a regulator), the information you provide is not admissible in evidence against you in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information;
- you are not subject to any civil, criminal or administrative liability for making the disclosure; and
- no contractual or other remedy may be enforced or exercised against on you the basis of the disclosure.

## Attachment 2

### Protections provided by law – Singapore

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#### 1 Additional legislative protections

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Additional legislative protections are available for protected disclosers who report certain information to certain people.

LOGOS encourages you to Speak Up under the Speak Up Policy. However, the law offers some protections in other cases. For example, you can disclose certain information to a longer list of people, beyond the Recipients identified in the Policy.

Protected disclosures and the additional legislative protections are summarised in this attachment. This is a summary only and is not comprehensive. If you would like further information about the legislative protections that may apply to disclosures, please contact a Recipient in section 4, who can provide you with further information. If you make a protected disclosure that does not comply with the Speak Up Policy, you may still be entitled to the legal protections as set out below.

#### 2 Protected disclosures

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There is no specific whistleblowing legislation in Singapore. The anonymity of informers is protected in certain circumstances, as outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
<ul style="list-style-type: none"> <li>Information relating to the investigation of offences under the Prevention of Corruption Act (Cap 241)</li> </ul>	<ul style="list-style-type: none"> <li>Prevention of Corruption Act (Cap 241)</li> </ul>
<ul style="list-style-type: none"> <li>Information relating to drug trafficking or criminal conduct</li> </ul>	<ul style="list-style-type: none"> <li>Corruption, Drug Trafficking and other Serious Crimes (Confiscation of Benefits) Act (Cap 65A)</li> </ul>
<ul style="list-style-type: none"> <li>Information relating to property or transactions relating to property belonging to terrorists and terrorist entities</li> </ul>	<ul style="list-style-type: none"> <li>Terrorism (Suppression of Financing Act) (Cap 325)</li> </ul>
<ul style="list-style-type: none"> <li>Information relating to the misuse of drugs</li> </ul>	<ul style="list-style-type: none"> <li>Misuse of Drugs Act 1973</li> </ul>
<ul style="list-style-type: none"> <li>Information relating to customs and excise offences</li> </ul>	<ul style="list-style-type: none"> <li>Customs Act 1960</li> </ul>
<ul style="list-style-type: none"> <li>Information relating to organised crime offences</li> </ul>	<ul style="list-style-type: none"> <li>Organised Crime Act 2015</li> </ul>

- Information relating to betting offences
- Information relating to the misuse of drugs

Employees who make good faith disclosures about workplace health and safety issues under the Workplace Safety and Health Act 2006 are protected from dismissal as a result of making a report.

## Attachment 3

### Protections provided by law – China

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#### 1 Additional legislative protections

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Additional legislative protections are available for protected disclosers who report certain information to certain people.

LOGOS encourages you to Speak Up under the Speak Up Policy. However, the law offers some protections in other cases. For example, you can disclose certain information to a longer list of people, beyond the Recipients identified in the Policy.

Protected disclosures and the additional legislative protections are summarised in this attachment. This is a summary only and is not comprehensive. If you would like further information about the legislative protections that may apply to disclosures, please contact a Recipient in section 4, who can provide you with further information. If you make a protected disclosure that does not comply with the Speak Up Policy, you may still be entitled to the legal protections as set out below.

#### 2 Protected disclosures

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PRC law protects the “legitimate rights and interests” of whistleblowers by requiring that prosecutorial authorities maintain the confidentiality of whistleblower information (including the identity of a whistleblower).

Whistleblowers who report crimes to the enforcement authorities are entitled to protection, anonymity and a right of appeal in the face of refusals to investigate. There is also a reward mechanism for whistleblowers who report crimes to People’s Procuratorates, and various other financial reward schemes are scattered in sector-specific regulations. PRC law also contains several measures that protect the personal safety of witnesses giving evidence in legal proceedings and their families, including keeping personal information of witnesses confidential, and adopting protective measures so that the witnesses’ appearance or voices are not made public.

Officials of state bodies are explicitly prohibited from retaliating against whistle-blowers. Labour administration authorities have power to impose fines on employers who retaliate whistle-blowers.

Certain information that is disclosed to certain people or organisations is protected by law. Examples of this information and recipients are outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
<ul style="list-style-type: none"> <li>Information about tax law non-compliance.</li> </ul>	<ul style="list-style-type: none"> <li>Local tax authority.</li> </ul>
<ul style="list-style-type: none"> <li>Information about criminal activities, bribery or corruption</li> </ul>	<ul style="list-style-type: none"> <li>People’s Procuratorates</li> <li>Public security bureau</li> </ul>

Information reported or disclosed	Recipient of disclosed information
<ul style="list-style-type: none"> <li>Information about labour law non-compliance</li> </ul> <p>There are a number of sources of protection in the PRC which may contain relevant provisions including:</p> <ul style="list-style-type: none"> <li>* Law of the People's Republic of China on the Protection of Rights and Interests</li> <li>* Provisional Measures for the Handling of Complaints and Whistleblowing Reports on Market Regulation</li> <li>* Incentives for citizens to report acts that endanger national security</li> <li>* Anti-organized Crime Law of the People's Republic of China</li> <li>* Approach to Compliance Building, Assessment and Review for Case-Involved Companies</li> <li>* Notice on the Publication of Typical Cases of Corporate Compliance</li> <li>* Interim Measures for Rewarding the Reporting of Major Violations in the Field of Market Supervision</li> <li>* Law of the People's Republic of China on the Protection of Personal Information</li> <li>* Data Security Law of the People's Republic of China</li> <li>* Work Safety Law of the People's Republic of China</li> </ul>	<ul style="list-style-type: none"> <li>Local labour bureau</li> </ul>

## Attachment

### Protections provided by law – India

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#### 1 Additional legislative protections

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Additional legislative protections are available for protected disclosers who report certain information to certain people.

LOGOS encourages you to Speak Up under the Speak Up Policy. However, the law offers some protections in other cases. For example, you can disclose certain information to a longer list of people, beyond the Recipients identified in the Policy.

Protected disclosures and the additional legislative protections are summarised in this attachment. This is a summary only and is not comprehensive. If you would like further information about the legislative protections that may apply to disclosures, please contact a Recipient in section 4, who can provide you with further information. If you make a protected disclosure that does not comply with the Speak Up Policy, you may still be entitled to the legal protections as set out below.

#### 2 Protected disclosures

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There is no specific whistleblowing legislation that applies to the private sector in India. However informers may be given anonymity and protected from victimisation in certain circumstances, as outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
<ul style="list-style-type: none"><li>Information related to corruption in the public sector</li></ul>	<ul style="list-style-type: none"><li>Whistle Blower Protection Act 2014</li></ul>
<ul style="list-style-type: none"><li>Information related to tax offences</li></ul>	<ul style="list-style-type: none"><li>Income Tax Act 1961</li></ul>
<ul style="list-style-type: none"><li>Information related to competition offences</li></ul>	<ul style="list-style-type: none"><li>Competition Act 2002</li></ul>



## Attachment

### Protections provided by law – South Korea

#### 1 Additional legislative protections

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Additional legislative protections are available for protected disclosers who report certain information to certain people.

LOGOS encourages you to Speak Up under the Speak Up Policy. However, the law offers some protections in other cases. For example, you can disclose certain information to a longer list of people, beyond the Recipients identified in the Policy.

Protected disclosures and the additional legislative protections are summarised in this attachment. This is a summary only and is not comprehensive. If you would like further information about the legislative protections that may apply to disclosures, please contact a Recipient in section 4, who can provide you with further information. If you make a protected disclosure that does not comply with the Speak Up Policy, you may still be entitled to the legal protections as set out below.

#### 2 Protected disclosures

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Informers may be given anonymity and protected from victimisation in certain circumstances, as outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
Information related to acts detrimental to the public interest, which includes: a) health and safety; b) the environment; c) the interest of consumers; d) fair competition	Act on the Protection of Public Interest Whistleblowers
Information related to: a) act of any public official's abusing his or her position or authority or violating statutes or regulations in connection with his or her duties to seek gains for himself or herself or any third party; b) act of inflicting damages on the property of any public institution in violation of statutes or regulations, in the process of executing the budget of the relevant public institution, acquiring, managing, or disposing of the property of the relevant public institution, or entering into and	Act on the Prevention of Corruption

Information reported or disclosed	Recipient of disclosed information
<p>executing a contract to which the relevant public institution is a party;</p> <p>c) act of coercing, urging, proposing and inducing any act under items (a) and (b) or act of covering it up.</p>	
Information related to labour law or health and safety breaches	<p>Labor Standards Act</p> <p>Equal Employment Opportunity and Work Family Balance Assistance Act</p> <p>Trade Union and Labour Relations Adjustment Act</p> <p>Industrial Safety and Health Act</p>

### 3 Specific Protections and Remedies

Under the Act on the Prevention of Corruption and the Act on the Protection of Public Interest Whistleblowers, monetary rewards may be available to whistleblowers in certain circumstances. In addition, a whistleblower:

- (a) may apply for reinstatement from the disadvantageous measures suffered due to the whistle blowing, including reinstatement of employment
- (b) may request for personal protection from the Anti-Corruption and Civil Rights Commission

## Attachment 6

### Protections provided by law – Malaysia

#### 1 Additional legislative protections

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Additional legislative protections are available for protected disclosers who report certain information to certain people.

LOGOS encourages you to Speak Up under the Speak Up Policy. However, the law offers some protections in other cases. For example, you can disclose certain information to a longer list of people, beyond the Recipients identified in the Policy.

Protected disclosures and the additional legislative protections are summarised in this attachment. This is a summary only and is not comprehensive. If you would like further information about the legislative protections that may apply to disclosures, please contact a Recipient in section 4, who can provide you with further information. If you make a protected disclosure that does not comply with the Speak Up Policy, you may still be entitled to the legal protections as set out below.

#### 2 Protected disclosures

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Whistleblowers may be protected from detriment in certain circumstances, as outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
Disclosure of "improper conduct", which means "any conduct which if proved, constitutes a disciplinary offence or a criminal offence".	Whistle Blower Protection Act 2010

#### 3 Specific Protections and Remedies

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Under the Whistleblower Protection Act, whistleblowers are protected from detrimental action. Specifically:

- (a) whistleblowers who fear, or have suffered, detrimental action may apply for relocation of their place of employment;
- (b) provisions in employment contracts that purport to prohibit disclosure of improper conduct are void;
- (c) whistleblowers may make a complaint and obtain protection against any detrimental action taken against them for blowing the whistle;

- (d) whistleblowers are entitled to confidentiality protection;
- (e) whistleblowers may gain immunity to civil and criminal action;
- (f) whistleblowers may be able to access to court and interim relief measures.

## Attachment 7

### Protections provided by law – Vietnam

#### 1 Additional legislative protections

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Additional legislative protections are available for protected disclosers who report certain information to certain people.

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Protected disclosures and the additional legislative protections are summarised in this attachment. This is a summary only and is not comprehensive. If you would like further information about the legislative protections that may apply to disclosures, please contact a Recipient in section 4, who can provide you with further information. If you make a protected disclosure that does not comply with the Speak Up Policy, you may still be entitled to the legal protections as set out below.

#### 2 Protected disclosures

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Whistleblowers may be protected from detriment in certain circumstances, as outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
Disclosure of a violation which causes or threatens damage to State interests or legitimate rights and interests of organisations and individuals including:	Law on Denunciation Law on Anti-Corruption Criminal Proceedings Code
a) Denunciation of violations against the law during performance of duties; <sup>1</sup>	
b) Denunciation of violations against the law related to state management of fields. <sup>2</sup>	

<sup>1</sup> "Denunciation of violations against the law during performance of duties" means the denunciation of violations against the law during performance of duties by:

- (a) An official, public official or public employee; other persons assigned to perform duties;
- (b) A person who is no longer an official, public official or public employee but committed violations against the law during the period he/she was an official, public official or public employee; a person who is no longer assigned to perform any duty but committed violations against the law during the period he/she was assigned to perform duties;
- (c) An organization.

<sup>2</sup> "Denunciation of violations against the law related to state management of fields" means the denunciation of violations against the law related to state management of fields committed by any organization and individual with respect to the compliance with regulations of law, except for violations against the law during performance of duties.

### 3 Specific Protections and Remedies

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Under the Law on Denunciation and the Law on Anti-Corruption informers are protected from detrimental action as a result of the disclosure, including employment violations.

Under the Criminal Proceedings Code, informers are entitled to personal safety protection.

## Attachment 8

### Protections provided by law – Indonesia

#### 1 Additional legislative protections

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Additional legislative protections are available for protected disclosers who report certain information to certain people.

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#### 2 Protected disclosures

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Whistleblowers may be protected from detriment in employment and monetary rewards may be available to whistleblowers in certain circumstances, as outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
Information in relation to criminal activity	Manpower Law
	Witness and Victim Protection Law

## Attachment 9

### Protections provided by law – Japan

#### 1 Additional legislative protections

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Additional legislative protections are available for protected disclosers who report certain information to certain people.

LOGOS encourages you to Speak Up under the Speak Up Policy. However, the law offers some protections in other cases. For example, you can disclose certain information to a longer list of people, beyond the Recipients identified in the Policy.

Protected disclosures and the additional legislative protections are summarised in this attachment. This is a summary only and is not comprehensive. If you would like further information about the legislative protections that may apply to disclosures, please contact a Recipient in section 4, who can provide you with further information. If you make a protected disclosure that does not comply with the Speak Up Policy, you may still be entitled to the legal protections as set out below.

#### 2 Protected disclosures

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Whistleblowers may be entitled to protection in relation to their life, health, property and other interests in certain circumstances, as outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
Information in relation to a 'reportable fact' which includes:	Whistleblower Protection Act
a) acts concerning the protection of life or body of an individual;	
b) the interests of consumers;	
c) the conservation of the environment;	
d) the protection of fair competition	