

# Whistleblower Policy

## Level 1: Board of Directors

**Owner/Author:** Chief Risk Officer

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# 1. Introduction and Application

## 1.1 Purpose of Policy

The Whistleblower Policy ('Policy') provides guidance around the protection for employees in reporting matters of concern in a defined framework to BankVic.

BankVic is committed to providing a safe environment for reporting behaviours that might not align with its corporate values, and encourages disclosure of any concerns as early as possible, so that they can be addressed and improvements made if needed. This Policy provides protection for Eligible Whistleblowers who have reasonable grounds to believe that an employee has violated the law or a BankVic policy, or has behaved unethically. This policy outlines the avenues in place to report these behaviours in a confidential or anonymous manner.

The Policy aims to:

- Provide a safe means to speak up (anonymously if requested) and report suspected wrongdoing, without fear of victimisation or reprisal;
- Provide protection for Eligible Whistleblowers in reporting and escalating incidents/issues;
- Promote a healthy and sustainable ethical culture;
- Provide consistency in dealing with any escalated incidents;
- Provide dedicated Nominated Officers to ensure that the whistleblower program is managed in accordance with this Policy; and
- Ensure any disclosures made are dealt with appropriately and on a timely basis.

This Policy is a valuable tool for helping BankVic identify misconduct that may not be uncovered unless there is a safe and secure channel available. BankVic encourages Eligible Whistleblowers who are aware of wrongdoing to have the confidence to raise these matters.

## 1.2 Who is an Eligible Whistleblower

An Eligible Whistleblower is defined as an individual who is any of the following:

- An officer or employee of BankVic;
- An individual who supplies services or goods to BankVic (whether paid or unpaid);
- An employee of a person who has a contract for the supply of services or goods to BankVic (whether paid or unpaid);
- An individual who is an associate of BankVic;
- A relative or dependant or spouse of any of the above, or
- Someone who was formerly any of the above (e.g., a former employee or contractor of BankVic).

A whistleblower qualifies for protection if they are an Eligible Whistleblower and:

- They have made a disclosure of information relating to a Disclosable Matter (see section 2.1) directly to an Eligible Recipient (see section 2.3) or to ASIC, APRA or another Commonwealth Body prescribed by regulation;
- They have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions under the *Corporations Act 2001*; or
- They have made an emergency disclosure or a public interest disclosure.

## 1.3 Compliance Assurance & Maintenance

The Chief Risk Officer (CRO) is responsible for compliance assurance and maintenance of this Policy. The Board Audit Committee has oversight of all internal whistleblower disclosures reported and any subsequent investigation and action taken.



To facilitate oversight, the CRO will report regularly to the Audit Committee on:

- All internal disclosure or whistleblower actions;
- A summary of the action taken and the results; and
- Any trends, themes, or emerging risks.

For the protection of all persons involved, unless matters of a serious nature are substantiated, or there are other compelling reasons to do so, information leading to disclosure of the identity of either the whistleblower or alleged perpetrator is prohibited from being disclosed to the members of the Audit Committee in this process.

## **1.4 Process**

BankVic is committed to effectively managing whistleblower reports. The Risk Management Committee must ensure that this Policy is available to all who may make a whistleblower disclosure to enable the effective management of the disclosure. Procedural guidance in relation to this Policy is provided in the Whistleblower Procedures.

## **1.5 Delegation**

The Board is ultimately responsible for any misconduct reported by an Eligible Whistleblower and their protection.

The Board can delegate operational responsibilities to Management with oversight by the Board Audit Committee.



## 2. Policy Detail

### 2.1 Matters The Policy Applies To

This Policy applies to disclosures that qualify for protection under section 1317AA of the *Corporations Act 2001* (Disclosable Matters), where there are reasonable grounds to suspect that BankVic or an officer or employee of BankVic has engaged in misconduct.

This may include, but is not limited to:

- Offering or receiving bribes;
- Illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- Fraud, money laundering, or misappropriation of funds;
- Financial irregularities;
- Failure to comply with regulatory requirements;
- Threatening or bullying behaviour;
- A matter that could pose a significant risk to public safety or the stability of, or confidence in the financial system, even if it is not a breach of law; or
- Release of confidential information for personal purposes.

#### 2.1.1 Matters Not Covered by This Policy

Disclosures that are not about Disclosable Matters do not qualify for protection under the *Corporations Act 2001*. However, these disclosures may be protected by other legislation, such as the *Fair Work Act 2009* (Fair Work Act).

This includes personal work related grievances related to an individual's former or current employment which may have personal implications. Examples of personal work-related grievances include, but are not limited to:

- An interpersonal conflict between the whistleblower and another BankVic employee;
- A decision that does not involve a breach of workplace laws;
- A decision about the engagement, transfer, or promotion of the whistleblower;
- A decision about the terms and conditions of engagement of the whistleblower; or
- A decision to suspend or terminate the engagement of the whistleblower, or otherwise discipline the whistleblower.

A disclosure about, or including, a personal work-related grievance may still qualify for protection if:

- It includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- BankVic has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the whistleblower's personal circumstances;
- The whistleblower suffers from, or is threatened with, detriment for making a disclosure; or
- The whistleblower seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

Any employee wishing to raise a personal work-related grievance, or any other type of issue or concern not covered by this Policy, is encouraged to speak to their leader or to a member of the People and Culture team.

### 2.2 False Reporting

Where an internal disclosure of significantly inappropriate or improper conduct is found to be a false report (i.e., a report that the whistleblower knows to be untrue), then that conduct itself will be considered a serious matter, subject to disciplinary proceedings in accordance with other BankVic policies and procedures.

A false report does not include reports where the whistleblower only has some information leading to a suspicion, but not all the details of the matter.



## 2.3 Who Can Receive a Disclosure

To qualify for protection as a whistleblower, the disclosure must be made to an Eligible Recipient. While a disclosure can be made to any Eligible Recipient, BankVic authorises and encourages disclosures be made to a Nominated Officers in the first instance:

- Chief Risk Officer (CRO);
- Company Secretary.

In addition to the above, Eligible Recipients include:

- Regulatory bodies e.g., ASIC, APRA, or a prescribed Commonwealth authority;
- BankVic's auditor or a member of an audit team conducting an audit on BankVic;
- A director, executive or company secretary of BankVic;
- A person authorised by BankVic to receive disclosures of this nature;

However, if the whistleblower wishes to make the disclosure through an anonymous channel, or feels uncomfortable making the disclosure directly to an internal BankVic Nominated Officer or Eligible Recipient, or feels it may be inappropriate, then the disclosure may be made to YourCall, BankVic's external independent service:

YourCall  
Phone: 1300 790 228  
24 hour online reporting service: [yourcall.com.au/bankvic](https://yourcall.com.au/bankvic)

Disclosures made to a legal practitioner, for the purposes of obtaining legal advice or representation in relation to the operation of the whistleblower provisions in the Corporations Act, are protected.

Disclosures can be made to a journalist or a parliamentarian, in certain circumstances. A public interest or emergency disclosure can be made; however, it must be in the form of a written notice which has previously been made to ASIC, APRA, or a prescribed body, at least 90 days before that time. The whistleblower should seek independent legal advice before making a public interest or emergency disclosure.

## 2.4 How To Make a Disclosure

Disclosures may be made in person, by phone, or in writing (i.e., email or online submission form) and may be made anonymously or confidentially, securely, and outside of normal business hours.

BankVic encourages any person making a disclosure to provide as much information as possible and provide supporting evidence where available.

As noted under section 2.3, if the whistleblower wishes to make the disclosure via an anonymous channel, feels uncomfortable making the disclosure to a Nominated Officer or an internal BankVic Eligible Recipient, or feels it is inappropriate, they may make it to BankVic's external independent service, YourCall. Alternatively, the Eligible Whistleblower can send an anonymous letter to a Nominated Officer.

### 2.4.1 What to Include in a Disclosure

A disclosure should include as much detailed information as possible so that a thorough investigation can be conducted.

At a minimum, the information provided should include:

- Dates, times, and locations of the suspected wrongdoing;
- Names of any people involved;
- The nature of the concern;
- How you became aware of the issue;
- Any concerns about reprisal or detriment because of making the disclosure;
- Any witnesses to the conduct being raised; and



- Any other information that may support the disclosure.

## 2.4.2 Anonymous Disclosures

Eligible Disclosures may be made anonymously and will be protected. A whistleblower may choose to remain anonymous while making a disclosure, over the course of the investigation and when an investigation is finalised and they may refuse to answer any questions that they feel may reveal their identity, including during any follow up conversations.

BankVic requests that, if a whistleblower wishes to remain anonymous, they maintain an ongoing two-way communication channel so they can be asked any follow up questions or be provided with feedback from the investigation.

Disclosure made through YourCall will also provide the option to remain anonymous. The Eligible Whistleblower will be provided with a unique *Issue ID* number to use so that updates can be provided and received on the disclosure.

If the whistleblower's identity cannot be determined, the disclosure will be treated as an anonymous disclosure. The whistleblower may adopt a pseudonym if this makes communication with BankVic easier.

To protect the whistleblower's identity, BankVic will:

- Not ask for the whistleblower's personal information if they have requested to remain anonymous;
- Communicate with the whistleblower through their chosen method of contact (e.g., an anonymous email address);
- Take measures to ensure only relevant personnel are a party to the investigation and any information regarding the disclosure;
- Treat all disclosures confidentially and keep all information relating to the disclosure secure; and
- Ensure that if the whistleblower's identity is revealed throughout the investigation process, the Discloser will be provided with all the confidentiality protections under the law and will be protected from any detrimental conduct.

## 2.5 Legal Protections for Disclosers

Legal protections are available to whistleblowers who qualify for protection as an Eligible Whistleblower. These include:

- Identity protection (confidentiality);
- Protection from detrimental acts or omissions;
- Compensation and other remedies; and
- Civil, criminal, and administrative liability protection.

These protections apply to internal disclosures, legal practitioners, regulatory, and other external bodies, and public interest and emergency disclosures.

### 2.5.1 Identity Protection (Confidentiality)

BankVic has a legal obligation to protect the confidentiality of a whistleblower's identity. BankVic will not disclose their identity or information that is likely to lead to their identification (regardless of whether it has been obtained directly or indirectly), except where permitted or required by law.

BankVic will only disclose the whistleblower's identity:

- to ASIC, APRA, or a member of the Australian Federal Police;
- to a legal practitioner (for the purposes of obtaining legal advice or legal representation);
- to a person or body prescribed by regulations; or
- with the express consent of the whistleblower.

BankVic will only disclose information contained within the disclosure, with or without consent if:

- the information does not include the whistleblower's identity;



- it has taken all reasonable steps to reduce the risk that the whistleblower will be identified from the information contained within the disclosure and any supporting documentation; and
- it is reasonably necessary for investigating the issues raised in the disclosure.

It is unlawful for a person or BankVic to identify the whistleblower or disclose information that is likely to lead to the identification of the whistleblower, outside the exceptions listed above.

If a whistleblower feels that a breach of confidentiality has occurred, they can lodge a complaint with either the Nominated Officer, any Eligible Recipient, or directly with a regulator such as ASIC, APRA or the ATO, for investigation.

## 2.5.2 Protection from Detrimental Acts or Omissions

BankVic will not engage in conduct that causes detriment to an Eligible Whistleblower (or another person) if:

- (a) BankVic believes or suspects that they made, may have made, or could make a disclosure that qualifies for protection; and
- (b) The belief or suspicion is the reason - or part of the reason - for the conduct.

BankVic has a responsibility to ensure that a whistleblower or person is not victimised, or treated unfavourably, because they have made a disclosure or supported another person to make a disclosure.

BankVic will not make any threat to cause detriment to a whistleblower (or another person). A threat may be express or implied, conditional, or unconditional. An Eligible Whistleblower (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

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

- Dismissal of an employee;
- Injury of an employee in their employment;
- Alteration of an employee's position to their disadvantage;
- Discrimination between an employee and other employees of the same employer;
- Harassment, intimidation, or victimisation of a person;
- Harm or injury to a person, including psychological harm;
- Damage to a person's property;
- Damage to a person's reputation;
- Damage to a person's business or financial position; or
- Any other damage to a person.

Examples of conduct that are not considered to be detrimental include, but is not limited to:

- Administrative action that is reasonable for the purpose of protecting a whistleblower from detriment (e.g., moving the whistleblower who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
- Managing a whistleblower's unsatisfactory work performance, if the action is in line with BankVic's performance management framework.

BankVic will take steps to ensure the whistleblower understands the reason for administrative or management action in the event that it may be undertaken.

## 2.5.3 Compensation and Other Remedies

An Eligible Whistleblower (or any person) may seek compensation and other remedies through the courts if:

- (a) They suffer loss, damage, or injury because of a disclosure; and
- (b) BankVic failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

A whistleblower should seek independent legal advice if they wish to seek compensation.





## 2.5.4 Civil, Criminal and Administrative Liability Protection

An Eligible Whistleblower is protected from any of the following:

- (a) Civil liability (e.g. any legal action against the whistleblower for a breach of any employment contract, duty of confidentiality, or another contractual obligation);
- (b) Criminal liability (e.g. attempted prosecution of the whistleblower for unlawfully releasing information, or other use of the disclosure being used against the whistleblower in a prosecution (other than for making a false disclosure)); and
- (c) Administrative liability (e.g. disciplinary action for making the disclosure).

These protections do not grant immunity for any misconduct an Eligible Whistleblower has engaged in, that is revealed through their disclosure.

## 2.6 Support And Practical Protection for Eligible Whistleblowers

BankVic will support anyone who has made a disclosure, and will actively protect Eligible Whistleblowers from detriment.

BankVic's Employee Assistance Program (EAP) is available for current partners and employees (and their immediate family members) who require external confidential support. BankVic's EAP provider, AccessEAP, offers a face-to-face service and a 24-hour help line and all contact is dealt with in the strictest confidence. Their contact details are:

Phone: 1800 818 728  
Email: [info@accesseap.com.au](mailto:info@accesseap.com.au)  
Web: [accesseap.com.au](http://accesseap.com.au)

BankVic will try to support all whistleblowers, however, there are times where we will not be able to provide the same support to non-employees that is provided to current employees and partners. Where this occurs, the support mechanisms will be adapted and applied to the extent reasonably possible.

BankVic will undertake the following measures to protect the confidentiality of a whistleblower's identity (where applicable):

- All personal information or reference to the whistleblower witnessing an event will be redacted;
- The whistleblower will be referred to in a gender-neutral context;
- Disclosures will be handled and investigated by qualified staff;
- Treat all disclosures confidentially and keep all information relating to the disclosure secure (both physical and electronic documentation);
- Restrict the number of persons who are directly involved in handling and investigating the disclosure (including those who are aware of the whistleblower's identity and have access to information that may lead to the identification of the whistleblower);
- Communications and documents relating to the investigation will not be sent to an email address or a printer that can be accessed by other staff; and
- Each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a whistleblower's identity may be a criminal offence.

In practice, people may be able to guess the whistleblower's identity if:

- The whistleblower has previously mentioned to other people that they are considering making a disclosure;
- The whistleblower is one of an exceedingly small number of people with access to the information; or
- The disclosure relates to information that a whistleblower has previously been told privately or in confidence.

In order to reduce the likelihood that the whistleblower will be identifiable, BankVic requests that the whistleblower keeps their disclosure confidential and limited to the Eligible Recipients.



## 2.6.1 Protection from Detrimental Acts or Omissions

BankVic will undertake the following measures to protect Eligible Whistleblowers from detrimental acts or omissions where applicable:

- Have support services available to whistleblower (e.g., AccessEAP) where possible;
- Implement actions to protect the whistleblower from detriment (e.g., allowing them to work from an alternative location if feasible);
- Ensure management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a whistleblower;
- Have complaint channels available to a whistleblower to report any actual or perceived detrimental acts or omissions as soon as they become evident (and investigate these complaints as a separate matter by a sufficiently senior officer not involved in dealing with the disclosure);
- Interventions for protecting the whistleblower if detriment has already occurred (e.g. investigate and address the detrimental conduct by taking disciplinary action, or other actions as necessary for the conduct that has occurred).

The whistleblower may choose to seek independent legal advice, or contact regulatory bodies such as ASIC, APRA or the ATO, if they believe they have suffered detriment.

## 2.7 Handling and Investigating a Disclosure

All whistleblower disclosures made will be investigated and recorded confidentially, fairly, and objectively. The investigation process will be undertaken in a timely manner and independent of any persons named in the disclosure.

To assist with protecting the identity of the Eligible Whistleblower, the Eligible Recipient must determine if the time and location for the making of the disclosure are appropriate. If the time and location are not suitable to ensuring privacy, the Eligible Recipient may reschedule to a more suitable time and location.

Upon receiving a disclosure, BankVic will ensure:

- The Eligible Recipient passes it on to the Nominated Officer, or a delegated senior manager if appropriate, for investigation;
- The Nominated Officer (or delegate) will contact the Discloser (if not anonymous) to discuss the measures in place to ensure the confidentiality of their identity; and
- Ensure appropriate records are maintained.

Each disclosure will be assessed to determine whether:

- (a) It qualifies for protection; and
- (b) A formal, in-depth investigation is required.

BankVic will thoroughly investigate any disclosure made and ensure it is conducted objectively, fairly, and independently of the persons or business units involved. The steps will include, but are not limited to:

- Establishing a core investigation team;
- Collecting all information relating to the disclosure from the whistleblower and independently; and
- Conducting interviews with all persons involved.

After the nature of the conduct is determined, BankVic will set a time frame to ensure that a thorough investigation is undertaken as quickly as possible. The investigation process may vary depending on the nature of the disclosure, and the level of the investigation will generally reflect the level of evidence supplied by the whistleblower. BankVic may engage the assistance of external parties where additional specialist skills or expertise are required.

If the whistleblower chooses to remain anonymous and they are not able to be contacted for further information (i.e., the whistleblower has not provided, or refused to provide, a means to contact them) throughout the investigation, BankVic will conduct the most thorough investigation possible with the information it is able to gather.

Where an investigation identifies a breach of law, internal policies, or procedures, appropriate disciplinary action may be taken, and the incident or breach reported in accordance with BankVic's incident management policies and procedures.



Where the whistleblower can be contacted, BankVic will keep the whistleblower informed by providing them with regular updates during the key stages of the process. The frequency and timeframes may vary depending on the nature of the disclosure.

The outcome of any investigation will be recorded in a formal internal report that will be securely and confidentially retained and reported to the Board.

Whistleblowers will generally be informed of the investigation outcome; however, it may not always be appropriate to provide the whistleblower with this information.

## 2.8 Ensuring Fair Treatment of Individuals Mentioned in a Disclosure

BankVic will ensure the fair treatment of anyone who is mentioned in a disclosure, including those who are the subject of a disclosure, by implementing the following measures:

- Disclosures will be handled confidentially, where it is practical and appropriate in the circumstances;
- Each disclosure will be assessed and may be the subject of an investigation;
- Where an investigation is undertaken, the process will be objective, fair, and independent; and
- BankVic's Employee Assistance Program is also available to any individual named in a disclosure, the contact details for this service can be found in section 2.6.

BankVic will determine the most appropriate time to inform an individual, who is subject to a disclosure, about the investigation. Informing an individual in the preliminary stages of an investigation may not be practical and may compromise the effectiveness of an investigation. An individual who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by the principles of natural justice and procedural fairness and prior to any adverse actions being undertaken.

## 2.9 Accessibility of Policy

BankVic will ensure that all employees (including new employees) are informed about this Policy, provide training around the requirements, and ensure a copy of this Policy is made available on BankVic's website and internal intranet.

Where a disclosure is made by a person outside of BankVic (and their identity is known), they will be provided with a copy of this Policy (or a link to it on our website) to ensure they are aware of the protections available to them.

# 3. Regulatory & Policy Framework

## 3.1 Regulatory

The Corporations Act requires BankVic, as a public company, to have a Whistleblower Policy and make it available to its officers and employees. Protection for whistleblowers is available to any whistleblower, as defined in Part 9.4AAA of the *Corporations Act 2001*.

## 3.2 Policy

BankVic will have procedures in place to ensure all relevant Business Units are fully aware of and comply with this Policy.

If any person has concerns in relation to the appropriateness, or otherwise, of any matters under this Policy, these concerns should be raised directly with the Policy Owner.



**a. Policy Breaches**

Policy breaches will be reported to the Board Risk Committee, however, they should first be escalated to the Policy Owner.

**b. Policy Exemption**

Policy exemptions may be granted under exceptional circumstances. Any exceptions are to be tabled at the next appropriate Board Risk Committee meeting and subsequently reported to the Board of Directors in a timely manner.



# POLICY ADMINISTRATION

<b>Executive Owner</b>	Chief Risk Officer
<b>Effective Date</b>	1 July 2024
<b>Board Approval</b>	26 March 2024
<b>Review Frequency</b>	Biennial
<b>Board Committee Review</b>	Risk Committee
<b>Approval Body</b>	Level 1 - Board
<b>Regulator (if applicable)</b>	Australian Securities & Investments Commission (ASIC)
<b>Compliance Mechanism</b>	Managed within business process and procedures with controls established by Process and Procedure Owners.
<b>Related Policies</b>	Anti-Fraud Policy Anti-Bribery and Corruption Policy BankVic Code of Conduct Confidentiality and Privacy Program (incl Privacy Policy) Conflict of Interest Policy Complaints & Dispute Resolution Program Incident Management Policy People & Culture Policies
<b>Supporting Procedures or Guidelines</b>	Conflict of Interest Procedures Complaint and Dispute Resolution Procedures Incident Management Procedures People & Culture Procedures

Version	Revision Date	Reason
1.0	Dec 2004	Policy creation
2.1	Mar 2017	Annual review
2.2	Mar 2018	Annual review
2.3	Jul 2018	Inclusion of external Whistleblower service
3.0	Jul 2019	Update to extend definition of Eligible Whistleblower
3.1	Nov 2019	Inclusion of stronger wording on victimisation
4.0	Mar 2020	Update consistent with ASIC regulatory guide 270
5.0	Feb 2022	Update to amend policy name to Whistleblower Policy and amendments to allow for publishing on external website
6.0	Jan 2024	Biennial review, minor edits to improve readability, renamed section 1.2
6.1	Jul 2024	Update external provider to YourCall, inclusion of Nominated Officers

**Current version is available on the Intranet and on the BankVic Website.**