

CFS Whistleblower Policy



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1. Governance

Applicable to	This policy applies to Eligible Persons (as defined in section 9) within CFS, including current and former employees, officers, directors, internal or external custodian or investment manager(s), contractors, consultants, suppliers and third-party providers, or a spouse or relative of one the persons referred to, but it does not apply to customers. This policy does not form part of any contract of employment or any industrial instrument.
Approver	Avanteos Investments Limited (AIL), Colonial First State Investments Limited (CFSIL) and Superannuation and Investments HoldCo Pty Limited (HoldCo) Boards
Owner	General Counsel
Review Cycle	Annual

2. Revisions

Version	Approval date	Effective date	Details
1.0	30 September 2021	1 December 2021	Newly created Whistleblower Policy for CFS, following separation from the Commonwealth Bank of Australia (CBA) on 1 December 2021 (Day 1). Pre-Day 1 CFS utilised CBA's Whistleblower Policy, a copy of that policy (in place pre-Day 1) can be obtained upon submitting a request to the Policy Governance Team.
2.0	24 November 2022	24 November 2022	Annual review.
2.1	As above version 2.0	As above version 2.0	Administrative updates made by Policy Governance Team. Policy transferred to new template and minor formatting and typographical changes made.
3.0	24 November 2023	24 November 2023	Annual review.
4.0	19 March 2024	1 May 2024	Change of external Whistleblower service provider.
5.0	17 February 2025	17 February 2025	Annual review.

3. Purpose and scope

At CFS our Code of Conduct emphasises the importance of speaking up as a critical component of our values expectations. CFS is committed to fostering a culture where you feel safe and are encouraged to report on matters or conduct that concerns you. This could be anything from serious misconduct to observing something that does not feel quite right.

CFS will support you through the Whistleblower Program and does not tolerate any Detrimental Conduct namely, conduct that causes or threatens to cause any detriment to you including detriment in the form of retaliation or victimisation, as a result of you speaking up or intending to speak up in accordance with this policy.

This policy aims to provide clarity on how CFS supports you so that you:

- are encouraged to express your concerns;
- know how to express your concerns;
- know what will happen when you express your concerns; and
- feel safe in expressing your concerns.

4. Policy statement

This policy requires that all disclosures of Reportable Conduct are protected, assessed, investigated and reported in accordance with the requirements of this policy.

This policy is available to CFS officers and employees on the CFS intranet and can also be found at the CFS public website under Corporate Governance.

For further information on making a report using Stopline please consult the FAQ [Colonial First State Online Reporting](#).

All CFS employees must undergo initial and ongoing education and training regarding this policy.

CFS also provides specialist training to those employees who have specific responsibilities under the policy.

5. Policy requirements

5.1 Reportable Conduct Definition

Reportable Conduct means any conduct in relation to CFS that is:

- dishonest;
- fraudulent;
- corrupt;
- illegal;
- unethical;
- in breach of internal policy (including the Code of Conduct);
- misconduct or an improper state of affairs in relation to a CFS entity;
- a danger, or represents a danger, to the public or financial system; or

- is otherwise a breach of law.

Reportable Conduct does not include disclosures determined by the Whistleblower Program to fall outside the scope of this policy. Refer to Appendix A for more details on Reportable Conduct and the “Assessment of disclosure” section below.

5.2 Making the disclosure & Referral

This policy applies where you make a disclosure of Reportable Conduct to:

- the Stopline service; or
- a Senior Leader; or
- the Whistleblower Protection Officer, details of which are in Appendix B.

Disclosures can also be made to a director of CFS, a CFS Internal Auditor, an Officer, or a person authorised to receive disclosures that may qualify for protection.

5.2.1 Personal work-related grievances

Reportable Conduct does not include personal work-related grievances. These are generally grievances relating to an employee’s current or former employment or engagement (or that of their relative or dependent who is an employee) that have implications for that person personally, and that do not have broader implications for CFS. For example, an interpersonal conflict between employees, or a decision relating to employment or engagement, such as a remuneration, transfer, promotion or disciplinary action of an employee.

Exceptions to this guidance may include, but are not limited to, the following:

- where an Allegation relates to a personal work-related grievance involving senior employees. In this instance, the matter may qualify within the intended scope of the Policy as the Allegation could point to an improper state of affairs;
- a personal work-related grievance that includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed disclosure); or
- the discloser suffers from, or is threatened with, detriment for making a report.

5.2.2 Anonymity

When making a disclosure, you may do so anonymously. You can continue to remain anonymous over the course of any investigation and after the investigation has been finalised. Whilst you are encouraged to share your identity when making a disclosure, (and the person to whom you make the disclosure is obligated to ask you) as it may make it easier for CFS to address your disclosure, you are not required to do so. If you do not share your identity, CFS will assess your disclosure in the same way as if you had revealed your identity. However, there may be some practical limitations in conducting the investigation if you do not share your identity, for example, should further information be required CFS will be unable to contact you.

If an anonymous disclosure is made through the Stopline service, you will receive a unique reference. You can then contact the Stopline service to provide further information or request an update at any time.

5.3 Other matters not considered a Whistleblower Disclosure

- Any complaints raised by an employee on behalf of a customer that meets the definition of a complaint as defined in ASIC’s Regulatory Guide 271 and does not meet the definition of Reportable Conduct;
- Less-serious issues, for example people smoking in undesignated areas or swearing in the workplace; or

- Feedback in relation to CFS policies, standards and other supporting documents.

5.4 Disclosures of Reportable Conduct

If you have received a disclosure of Reportable Conduct, you must seek permission (preferably in writing) from the individual for the matter to be referred to Stopline or the Whistleblower Reporting Officer.

If you have any doubt regarding the referral process or whether the matter potentially relates to a Whistleblower Disclosure, you should seek advice from CFS Legal.

5.5 Assessment of disclosure & triage

5.5.1 Review of the disclosure

You will receive an acknowledgement of your disclosure where CFS is able to contact you.

The Whistleblower Program will assess whether a disclosure falls within the intended scope of this policy. A disclosure will not be dealt with under this policy if it does not fall within the scope of applicable whistleblower rules.

All qualifying Whistleblower Disclosures will be referred to a Whistleblower Investigation Officer.

In conducting an assessment of the disclosure the following matters will be considered:

- whether the disclosure meets the definition of Reportable Conduct (Appendix A); or
- whether the disclosure is one that falls within the intended scope of the Policy; and
- whether the person making the report meets the definition of Eligible Person.

The Whistleblower and Stopline service should refer matters that are out of scope of this policy, to the relevant CFS Team for action where appropriate. All disclosures must be treated sensitively.

5.5.2 Referral of disclosure to Office of the FAR

The Whistleblower Investigation Officer carrying out the investigation under para 5.5.1 must refer the disclosure to the Office of the FAR if required to do so under the CFS Risk Matters Standard.

5.6 Protections & Support (Whistleblower)

5.6.1 Confidentiality

All information received from you will be treated confidentially and sensitively.

If you make a disclosure, your identity (or any information which would be likely to identify you) will only be shared if:

- you give your consent to share that information; or
- the disclosure is allowed or required by law (for example, disclosure to a lawyer to obtain legal advice relating to the law on whistleblowing).

5.6.2 Sharing of a Whistleblower Disclosure

In the event that it is considered to be reasonably necessary to share the information for the purposes of an investigation, all reasonable steps will be taken to reduce the risk that you will be identified.

However, there may be other circumstances where a Whistleblower Disclosure may need to be shared, including:

- to make a report to a regulator or law enforcement body required by law;
- if CFS is compelled by law to do so; or
- to seek legal advice in relation to that particular disclosure.

5.6.3 Protecting confidentiality

CFS will take reasonable measures to protect your identity and any information within a disclosure likely to identify you, which may include but not limited to:

- limiting access to all information to those directly involved in managing and investigating the disclosure;
- securely storing all paper and electronic documents and other materials relating to the disclosure;
- using a pseudonym to refer to you and the disclosure; and
- providing training and awareness about the confidentiality requirements and consequences of breaching confidentiality to those involved in handling and investigating disclosures.

While reasonable measures will be taken to protect your identity it is important to note that in practice, others may still be able to identify you if:

- you have previously discussed your intention to make a disclosure with others;
- you are one of a limited number of persons with access to the information provided in the disclosure; or
- your disclosure relates to information that has previously been told to you in confidence.

5.6.4 Role of the Whistleblower Protection Officer

You will have access to the assistance of the Whistleblower Protection Officer who must:

- assess and monitor any risks of Detrimental Conduct and take the necessary steps to protect you from those risks;
- assist you in maintaining your wellbeing, which may include providing strategies to minimise and manage stress resulting from making the disclosure or referring you to counselling and/or other professional services as appropriate;
- maintain your confidentiality, where relevant, including as required by law;
- review and consider any complaints of Detrimental Conduct or any concern that your disclosure has not been dealt with in accordance with this policy; and
- escalate any matter the Whistleblower Protection Officer considers appropriate to the Chief Risk Officer, as appropriate.

5.6.5 Detrimental Conduct Prohibited

CFS strictly prohibits all forms of Detrimental Conduct against you. Detrimental Conduct means any actual or threatened conduct that could cause a detriment to you as a result of you making a disclosure, including:

- termination of employment;
- harassment, bullying or intimidation;
- personal or financial disadvantage;
- unlawful discrimination;
- harm or injury, including psychological harm;

- damage to reputation; or
- any other conduct that constitutes retaliation.

Not all conduct will amount to Detrimental Conduct such as managing poor work performance in line with CFS' performance management procedures.

CFS will take all reasonable steps to protect you from Detrimental Conduct and will take action it considers appropriate where such conduct is identified.

CFS also strictly prohibits all forms of Detrimental Conduct against people who are involved in an investigation of a Whistleblower Disclosure in response to their involvement in that investigation.

5.6.6 CFS record-keeping and information sharing procedures

The following steps will be followed in relation to recordkeeping and information sharing:

- all paper and electronic documents and other materials relating to disclosures are stored securely in accordance with the CFS Information Security Policy and its supporting documents;
- all information relating to a disclosure can only be accessed by those directly involved in managing and investigating the disclosure;
- only a restricted number of people who are directly involved in handling and investigating a disclosure are made aware of a Whistleblower's identity or information that is likely to lead to the identification of the Whistleblower; and
- communications and documents relating to the investigation of a Whistleblower Disclosure are not sent to an email address that can be accessed by other employees.

5.6.7 Anonymous disclosures

If a disclosure comes from an email address from which the person's identity cannot be determined, and the discloser does not identify themselves in the email, it should be treated as an anonymous disclosure.

5.6.8 Additional protections

Some laws provide additional protections and remedies for certain disclosures by people who make them in accordance with the provisions of that legislation. These protections are designed to encourage people to disclose unlawful, improper or unethical behaviour to relevant parties.

You will not be subject to any civil, criminal or administrative liability for making a Whistleblower Disclosure. No contractual or other remedy may be enforced or exercised against you on the basis of the Whistleblower Disclosure.

Relevant laws can be found within the 'Relevant Documents' section of this policy.

5.7 Protections (Accused)

CFS will take all reasonable measures to protect the identity of an Accused and any information likely to identify an Accused. Information that may identify an Accused must not be disclosed without the consent of the Whistleblower Investigations Officer and the Whistleblower Reporting Officer. Information may only be disclosed to a person(s) required to fulfil an obligation/duty under this policy or if required by law. To the extent information is not required for the purposes of this policy or law, the information should be destroyed or permanently masked.

5.8 Investigation & Progress Updates

5.8.1 Review of the Allegations

The Whistleblower Investigation Officer will carry out a preliminary review of the Whistleblower Disclosure and will decide whether the Allegations raised should be investigated. Whilst not all Whistleblower Disclosures will necessarily lead to an investigation, they will be assessed and a decision made as to whether they should be investigated. For example, the Whistleblower Investigation Officer may decide that the Allegations were investigated previously and that a new investigation will not be undertaken.

CFS' response to a Whistleblower Disclosure will vary depending on its nature (including the amount of information provided). The Whistleblower Investigation Officer will advise you of the decision whether to investigate, unless the Whistleblower Investigation Officer has no means to contact you.

If the Whistleblower Investigation Officer decides that the Allegations will be investigated, the Whistleblower Investigation Officer will conduct or commission an investigation.

5.8.2 Investigation process

Investigations will follow an objective and fair process, be conducted in as timely a manner as the circumstances allow and be independent of the person(s) about whom an Allegation has been made. The Whistleblower Investigation Officer will, as appropriate, provide you with feedback on the progress throughout the investigation and expected timeframes of the investigation. Investigation timeframes will vary on a case by case basis. Provided there are no restrictions or other reasonable bases for doing so, persons against whom an Allegation has been made will be informed of the Allegation and will have an opportunity to respond to any Allegation.

5.9 Investigation Findings and Outcome

The investigation may conclude with a report from the Whistleblower Investigation Officer or other investigator. The report will include findings on the Allegations and a summary of the evidence on which the findings are based.

To the extent permitted under applicable laws, the Whistleblower Investigation Officer may inform you and/or a person against whom Allegations have been made by you of the findings.

Any report will remain the property of CFS and will not be shared with you or any person against whom Allegations have been made.

5.10 Support

If you are a current or former employee (or an immediate family member thereof), you may access CFS' confidential counselling service, Employee Assistance Program (EAP). Current and former employees may also request additional support from the Whistleblower Protection Officer if required.

CFS will endeavour to support you, but it will not be able to provide the same practical support to non-employees that it provides to current employees. Therefore, the processes in this policy will be adapted and applied to the extent reasonably possible.

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

CFS may, at its discretion, grant you immunity from internal disciplinary proceedings relating to matters that come to light as a result of your disclosure.

5.11 Escalation

5.11.1 Escalations to the Whistleblower Protection Officer

You should immediately inform the Whistleblower Protection Officer if you are concerned that:

- you may be, are being, or have been subjected to Detrimental Conduct; or
- your disclosure has not been dealt with in accordance with this policy, including any assessment made by the Stopline service.

The Whistleblower Protection Officer will consider the concerns you have raised and, if appropriate, may take such action as the Whistleblower Protection Officer considers appropriate. Although, the Whistleblower Protection Officer may not be able to take action if you wish to remain anonymous.

5.11.2 Escalations to the Chief Risk Officer (CRO)

You may escalate your concern directly to the CRO, if you consider that:

- the Whistleblower Protection Officer has not adequately resolved a complaint regarding Detrimental Conduct; or
- the policy has not been followed by CFS.

You may request that the Whistleblower Protection Officer escalate your concerns to the CRO, if you are not satisfied with the:

- findings of the investigation; or
- decision of the Whistleblower Investigation Officer not to conduct an investigation.

If you make such a request, you may provide the Whistleblower Protection Officer with a written submission to be sent to the CRO setting out your concern.

5.12 Reporting to regulators and other external parties

Nothing in this policy is intended to restrict you making a Whistleblower Disclosure to, providing information to, or communicating with a government agency, law enforcement body or a regulator (e.g. ASIC, APRA, or the ATO in Australia), in accordance with any relevant law, regulation or prudential standard applicable in a jurisdiction in which CFS operates. Nor does this policy restrict you from seeking independent legal advice before or after making a disclosure or during the investigation process.

Whistleblower Disclosures can also be made to:

- a legal practitioner, where the disclosure is for the purpose of obtaining legal advice or legal representation in relation to the making of a Whistleblower Disclosure; and
- journalists and members of the Commonwealth, state or territory parliaments where you have previously made a disclosure to ASIC or APRA in writing and in accordance with the required timeframes and relevant law.

Disclosures of Reportable Conduct to a regulator or other external party may still qualify for protections.

5.13 Reasonable basis for the making the disclosure

When making a disclosure, you will be expected to have reasonable grounds to suspect the information you are disclosing is true. You will not be penalised and can still qualify for protections even if the information turns out to be incorrect. However, you must not make a report you know is not true or is misleading. Where it is found that you knowingly made a false report, this may be a breach of the Code of Conduct and

will be considered a serious matter that may result in disciplinary action. There may also be legal consequences if you make a knowingly false report.

5.14 Whistleblower Program Alternate

For the purpose of this policy, the CRO will play the role of the Whistleblower Program if a disclosure relates to an employee in the Whistleblower Program or the Whistleblower Investigations Officer (or their respective reporting lines), including reporting to the Board Audit and Risk Committee where necessary.

6. Accountabilities

This policy has four principal roles. Their accountabilities are set out in the table.

6.1 Line 1 – Roles and Accountabilities

Role	Accountabilities
The Whistleblower Reporting Officer (WRO) , being the General Counsel and Chief Compliance Officer (or equivalent)	- Championing the Whistleblower program and Stopline and overseeing the implementation and effectiveness of the program. - Responsible for triaging concerns raised through Stopline to determine whether a matter falls within the scope of the policy. - Overseeing the Whistleblower Program's reporting requirements to the CFS Board Audit and Risk Committee and appropriate CFS governance committees. - Overseeing management of a secured central repository for recording of Whistleblower Disclosures.
The Whistleblower Investigation Officer (WIO) , being: - Senior Legal Counsel in the CFS Legal (Team or external lawyers (as applicable); or - any other employee determined by CFS to be appropriately skilled to investigate the disclosure.	- Determine whether Allegations raised should be investigated and commission an investigation as required. - Follow an objective and fair process, conduct the investigation in a timely manner and be independent of the person(s) about whom an Allegation has been made. - Provide ongoing feedback on the progress and timeframes of the investigation to the Whistleblower, as appropriate. - To the extent permitted, inform the Whistleblower and/or person(s) against whom Allegations have been made of the investigation findings.
Except in exceptional circumstances, in order to protect the Whistleblower, a person who is appointed a WIO cannot be appointed a WPO in relation to the same matter.	
The Whistleblower Protection Officer (WPO) , being a senior executive employed in CFS Human Resources	- Assess and monitor any risks of Detrimental Conduct and arrange modifications if required. - Assist in maintaining the wellbeing of the Whistleblower including protecting confidentiality and coordinating support services. - Review and consider any complaints of the Detrimental Conduct. - Escalate matters as appropriate to the WRO or CRO.

6.2 Line 2 – Roles and Accountabilities

Role	Accountabilities
CFS Chief Risk Officer (CRO)	to implement the Whistleblower Program where a Disclosure relates to an employee within CFS Legal or the WPO.

7. Compliance statement

This policy has been developed having regard to the whistleblower compliance obligations with which CFS must comply, including the Corporations Act 2001 (Cth) and ASIC Regulatory Guide 270 Whistleblower policies.

8. Breach of policy

8.1 Consequences

Breach of this policy may be regarded as misconduct, which may lead to disciplinary action (including termination of employment or engagement). An individual may also be exposed to criminal or civil liability for a breach of relevant law.

8.2 Escalation

Any alleged breach of this policy will be taken seriously and, if appropriate, will be separately investigated. Potential or actual breaches of this policy must be escalated according to the CFS Risk Management Framework and its supporting documents.

9. Definitions

Accused	A person against whom an Allegation(s) has been raised.
Allegations	Allegations of Reportable Conduct raised in a disclosure by a Whistleblower made under this policy.
CFS	‘Colonial First State’ means Superannuation and Investments HoldCo Pty Limited and any of its wholly owned related entities. Also separately the definitions should be alphabetical which they aren’t here
CFS Internal Auditor	An employee or secondee of an audit team involved in conducting an audit, other than support and administrative employees, that ultimately reports to the Head of Internal Audit CFS or an equivalent role.
Detrimental Conduct	Any actual or threatened conduct that could cause a detriment to the Whistleblower as a result of making the disclosure. Types of Detrimental Conduct are referred to in the “Detrimental Conduct Prohibited” in section 5 above.
Eligible Person	An individual who is, or has been, one of the following: - Director, employee, secondee; - Contractor, consultant, supplier, service provider (or their employee or subcontractor), volunteer;

	• licensee (or its authorised representative or their employee); or • broker, auditor, trustee, custodian or investment manager, of, or working with, CFS, or a relative, dependant or spouse of one of the above. • An external eligible recipient such as CFS's external auditor (although auditor is called out in the above bullet point)
Officer	As defined by Section 9(b)(ii) of the Corporations Act (Cth) and includes a director or secretary, or any other person who makes, or participates in making decisions that affect the whole, or a substantial part of the business of the corporation, or who has the capacity to affect significantly the corporation's financial standing.
Reportable Conduct	Means any conduct in relation to CFS as defined in the "Reportable Conduct Definition" in section 5.1 above and Appendix A of this policy.
Senior Leader	The CEO, a CFS Executive or Executive Director or Executive Director of Internal Audit.
Stopline	An outsourced service to provide safe avenues to enable employees and third parties to raise issues without fear of reprisal under the Whistleblower Program.
Whistleblower	An Eligible Person who makes a disclosure of Reportable Conduct in the manner described in this policy.
Whistleblower Disclosure	A disclosure made by a Whistleblower that is being treated in accordance with this policy.
Whistleblower Program	A program providing safe avenues and formal processes to enable employees and third parties to raise issues without fear of reprisal
You	'You', 'you' or 'your' refer to a Whistleblower or someone contemplating making a disclosure.

10. Relevant documents

Related internal documents	CFS Code of Conduct CFS Anti-Bribery and Corruption Policy CFS Fraud and Management Policy CFS Fit and Proper Policy CFS Privacy Policy (External) CFS Privacy Policy (Internal) CFS Records Management Policy CFS Risk Management Framework and its supporting documents
External sources of obligations	<i>Corporations Act 2001</i> (Cth), Part 9.4AAA (" <i>Protection for Whistleblowers</i> ") Fair Work Act 2009 Tax Administration Act 1953 ASIC Regulatory Guide 270 Whistleblower policies CPS 520 Fit & Proper

Appendix A – Reportable Conduct

Conduct	Guidance
Dishonest	Dishonest conduct may include: - undisclosed conflicts of interest; or - deliberate concealment of anything that is considered Reportable Conduct.
Fraudulent	Any conduct where a financial benefit is obtained by deception, which may include: - false applications or claims; - falsifying signatures; or - misappropriation of funds. This does not include external fraud with no employee misconduct, meaning fraud that is committed by customers or other external parties where CFS is a victim.
Corrupt	Corrupt conduct may include: - soliciting, promising, authorising, accepting or offering a bribe or kickback; - an act or omission for an improper or unlawful purpose which involves the abuse of a position of trust or power; or - making a facilitation payment.
Illegal	Illegal conduct may include: - financial crimes, such as money laundering, bribery and corruption; - sexual harassment; - unlawful harassment; - a breach of a regulation; - insider trading; - theft of assets, including property, data, or cash; - anti-competitive behaviour; or - reckless breaches of duty of care under work health and safety obligations
Unethical	Unethical conduct may include: - knowingly making false statements to members; - manipulating investment returns; or - deliberate misuse of member information.
A breach of internal policy including the Code of Conduct	Any conduct that is in breach of CFS internal policy.
Misconduct, or an improper state of affairs in relation to a CFS entity	Whilst the Corporations Act, 2001 (Cth) does not define ‘misconduct’, the Australian Prudential Regulatory Authority (APRA) says that ‘misconduct’ may include: - failure to comply with a legal duty; - gross mismanagement or waste; - dishonest or unethical behaviour by an individual; or - fraud or other type of criminal behaviour.
A danger, or represents a danger, to the public or financial system	This may include: - breaches to reporting obligations under the AML/CTC Act; or - any act or omission, illegal or otherwise, which may present a significant risk to safety or the stability of the financial system.

Appendix B – Avenues for making the disclosure

Stopline Service

CFS offers a service that is available for people to raise issues impacting their role, their wellbeing at work, or CFS, including Reportable Conduct under this policy. Anonymous reporting is available through each of these reporting channels:

Phone:	1300 30 45 50 (Australia Only) Calls will be received by Stopline on business days between 8.00 AM and 6.00 PM (AEST). Outside these times, the discloser may leave a voicemail or choose to speak with Stopline. If a voicemail is left with sufficient details, Stopline will return the call upon resumption of normal business hours.
Mail:	Attn.: Colonial First State, c/o Stopline PO Box 403 Diamond Creek VIC 3089
Email:	makeareport@stopline.com.au
Website:	https://cfs.stoplinereport.com
Via Smartphone:	

For further information on making a report using Stopline please consult the frequently asked questions at this address: <https://cfs.stoplinereport.com/faq/>

Person Nominated in Policy

Disclosures may also be made to a person nominated in the policy as being eligible to receive disclosures of Reportable Conduct, which include the following:

- A Senior Leader;
- The Whistleblower Reporting Officer (WRO);
- A Director of CFS; or
- An Internal Auditor

In most cases, the Senior Leader and WRO will seek your consent to share the information provided with the Stopline service in order for the concern to be investigated. An individual qualifies for protection as a Whistleblower from the time they make their disclosure, regardless of whether they or the recipient recognises that the disclosure qualifies for protection.

Appendix C – General process of Disclosures of Reportable Conduct

