



7-ELEVEN WHISTLEBLOWER POLICY





Table of Contents

1	PURPOSE	3
2	POLICY STATEMENT	3
3	SCOPE	3
4	PROCEDURE FOR RAISING A CONCERN	4
5	INVESTIGATION PROCEDURES.....	5
6	SUPPORT FOR WHISTLEBLOWERS.....	5
7	CONFIDENTIALITY	6
8	FALSE DISCLOSURES.....	7
9	ESCALATION PROCEDURE.....	7
10	STATUTORY PROTECTIONS	7
11	AVAILABILITY OF POLICY	8



1 PURPOSE

1.1 This Whistleblower Policy (**Policy**) is intended to encourage and enable team members of 7-Eleven Stores Pty Ltd (**7-Eleven**) and Convenience Holdings Pty Ltd (**Convenience Holdings**) (together, the **Group**) to raise genuine issues and concerns in regard to misconduct, unethical or illegal activity, breaches of the Codes of Conduct (as defined below), or malpractice in the Group without fear of intimidation or reprisal.

2 POLICY STATEMENT

2.1 This Policy is intended to support the Convenience Holdings Code of Conduct and the 7-Eleven Code of Conduct (**Codes of Conduct**). All members of the Group have a responsibility for the success of this Policy. If you think, or suspect, that something is wrong you have a duty to raise questions and report concerns as soon as practically possible.

3 SCOPE

3.1 This Policy outlines how you can raise concerns about actual, suspected or anticipated wrongdoing within the Group. Concerns may include:

- Dishonest, unethical, fraudulent, illegal or corrupt behavior;
- Breach of any legislation;
- Breach of internal policy or the 7-Eleven Code of Conduct;
- Unsafe work practices, environmental or health risks; and
- Any other conduct, deliberate or otherwise, that may cause material financial or non-financial loss to the Group.

3.2 All Group team members (including former team members), service providers and suppliers (and their current and former employees) may make use of this Policy and associated Whistleblower Service. A family member of any of these persons may also use this Policy.

3.3 This Policy is not intended to cover personal workplace grievance issues that you may have, including:

- An interpersonal conflict between you and another team member;
- A decision relating to your engagement, transfer or promotion;
- A decision relating to the terms and conditions of your employment; and
- A decision to suspend or terminate your employment, or otherwise to discipline you.

3.4 Complaints of this nature should be reported through the Workplace Grievance Policy or the Workplace Treatment Policy. Nothing in this Policy is intended to remove or dilute the People &



Communications team's responsibility to investigate or deal with grievances that are covered by existing People & Communications policies. However, this Policy recognises that there may be circumstances where such issues are of an extent or of such a serious nature that they move beyond individual grievances. Where there is any doubt as to the correct reporting route or if you are not comfortable raising people related issues through the People & Communications frameworks, you should call the Whistleblower Service for further information. If you are a franchisee team member and your concern relates to a franchisee in the 7-Eleven Network, the following dedicated services are available for employee support:

- To raise wage-related concerns about any franchisee in the 7-Eleven network you may anonymously contact the 7-Eleven Wage Claims Program by email at 7elevenWCP@7eleven.com.au or via the internet at www.7eleven.com.au/wageclaimsprogram.
- To raise any issue or concern in regard to misconduct, unethical and illegal activity by a franchisee in the 7-Eleven Network please get in contact with the 7-Eleven Franchisee Team Member Helpline on 1800 711 243 or by email at 7elevenhelpline@erstrategies.com.au

3.6 For further information about these franchisee employee helplines, please refer to the Franchisee Team Member Handbook. Reports made to these helplines will be handled in accordance with the policies and procedures which apply to the helplines.

4 PROCEDURE FOR RAISING A CONCERN

4.1 This Policy is designed to complement the normal communication channels between people leaders and team members. You are encouraged to report matters to any of your line manager. If for whatever reason you don't think you can, or you believe your reported concern has not been appropriately dealt with, you may use any of the services provided below:

4.1.1 Whistleblower Service

You may call 1800 667 471 during ordinary business hours for a service operated by an external and independent professional services organisation, with employees who are trained in confidential reporting and whistleblower protection. This may be a useful channel in circumstances where your report concerns the Whistleblower Protection Officer or a senior manager, or an alleged breach of this Policy.

4.1.2 Whistleblower Protection Officers (WPOs)

- 7-Eleven General Counsel by email at juw@7eleven.com.au
- 7-Eleven Head of Risk by email at dvg@7eleven.com.au



These WPOs are specially trained internal resources that are responsible for administering Policy. They are best placed to ensure your report is properly investigated, and your identity protected during the process.

4.1.3 Senior Managers

You can make a report to any member of the Group's senior leadership team, but the best placed officers for receiving reports are:

- General Manager, Commercial and Business Assurance by email at jcp@7eleven.com.au
- General Manager, People and Communications slb@7eleven.com.au

(together known as the **Whistleblower Contacts**).

4.2 When you make a report, you can choose not to identify yourself. However, this makes the investigation process more difficult and the Group encourages you to disclose your identity so that the officers can investigate the report more thoroughly and ensure you are supported and protected.

5 INVESTIGATION PROCEDURES

5.1 The Whistleblower Contacts are required to assess the concern(s) raised and recommend a course of action. All matters raised will be treated in a secure and sensitive nature with appropriate confidentiality but not all of them will proceed to investigation.

5.2 Investigation processes will vary depending on the precise nature of the conduct being investigated. The Whistleblower Contacts will assess who is a suitable person or persons to conduct an investigation into the concern(s) raised. The Group aims to start the investigation within two weeks of disclosure in some circumstances and you may be asked to provide more information during the course of the investigation.

5.3 All investigations must be conducted in a manner that is fair, objective and affords natural justice to all people involved. A matter will not be investigated by someone who is personally implicated in the concern so as to create a conflict of interest.

5.4 Where illegal conduct has occurred, matters may be reported to relevant authorities.

6 SUPPORT FOR WHISTLEBLOWERS

6.1 The Group enforces a strict policy against retaliation against individuals who make a report under this Policy where there are reasonable grounds for the report. No one may threaten you or take action against you for raising questions or reporting concerns to any supervisor, line manager, or via the Whistleblower Contacts where you have a reasonable basis for raising the concerns or questions.



- 6.2 No team member who raises genuinely held concerns will be subjected to any detriment as a result of such action, even if the concern turns out to be unfounded.
- 6.3 If you believe that you are being subject to a detriment within the workplace as a result of raising concerns under this procedure, you should inform one of the Whistleblower Contacts immediately.
- 6.4 The Group is committed to ensuring the fair treatment of any whistleblower or any officer or team member who is mentioned in a report made pursuant to this Policy by:
- Maintaining the confidentiality of information contained in reports made in accordance with the requirements of this Policy;
 - Applying the investigation procedures outlined above; and
 - Providing access to People & Communications support or relevant policies – e.g. Workplace Grievance Policy or the Workplace Treatment Policy.

7 CONFIDENTIALITY

- 7.1 The Whistleblower Contacts will ensure that your identity, and the information in your report remains confidential.
- 7.2 If you disclose your identity, the only people who will know your details will be the Whistleblower Contact, and any investigator assigned. By making a report to a Whistleblower Contact, you consent to your identity being shared with the investigator for the purpose of conducting an investigation under this Policy so you should inform the Whistleblower Contact if you do not want this to occur. Nobody else will be informed of your identity unless:
- The Group is legally obliged to disclose your identity;
 - Disclosure is necessary for some emergency; or
 - You consent to the disclosure.
- 7.3 The information you provide will also be held securely. There may be an electronic record kept by the Group to assist in the investigation of your report, but the only additional people that will have access to this are incidental IT specialists who administer the platform.
- 7.4 Any unauthorized disclosure of your identity, or the substance of your report will be a breach of this Policy and will be dealt with under the Group's disciplinary procedures. You should consider the Escalation Procedure heading below.



8 FALSE DISCLOSURES

8.1 Reporting concerns has the potential to damage the career prospects and reputation of people who are the subject of allegations. If your report is found to be malicious, deliberately misleading or frivolous, you may be subject to disciplinary action.

9 ESCALATION PROCEDURE

9.1 If you are not satisfied with the response you have received under this Policy you should raise the matter with the Chair of the 7-Eleven Internal Audit Committee or the 7-Eleven Company Secretary outlining your reasons.

10 STATUTORY PROTECTIONS

10.1 Both the Corporations Act 2001 (Cth) ("**Corporations Act**") and the Taxation Administration Act 1953 (Cth) ("**Taxation Administration Act**") provide special statutory protections for eligible whistleblowers who make a disclosure which qualifies for protection under each Act.

10.2 The protections available under the legislation to an individual who meets the requirements above include:

- The right to have their identity protected in accordance with the provisions of that legislation;
- The right to have information provided as part of the disclosure handled in accordance with the provisions of that legislation;
- The right to be protected from civil, criminal or administrative liability (including disciplinary action) for making the disclosure; from contractual or other remedies on the basis of the disclosure; and from the admissibility of the information provided in evidence against the person, in each case in accordance with the provisions of that legislation;
- The right to be protected from detrimental treatment or any form of victimisation in accordance with the provisions of that legislation;
- The right to compensation and other remedies in accordance with the provisions of that legislation (including a right not to be required to pay costs incurred by another person when litigation is commenced); and
- The right not to be required to disclose their identity before any court or tribunal in accordance with the provisions of that legislation.

10.3 If you have any further questions about these protections you should contact one of the Whistleblower Contacts.



11 AVAILABILITY OF POLICY

- 11.1 This Policy is available to all officers and team members of the Group through the People and Communications page via the 7-Eleven intranet.
- 11.2 This Policy is also available to external parties via the 7-Eleven intranet page.