



Commonwealth Bank
of Australia (Europe) N.V.

Whistleblower Policy

Commonwealth Bank of Australia (Europe) N.V.

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Group Use

Document control table

Version Number	Date Issued / Reviewed	Amendment Description
1.0	Jan 2020	
2.0	April 2021	Revision of Policy owner and roles within Whistleblower Policy
3.0	July 2022	Revision of Policy to remain consistent with revised Group policy (effective 13 April 2022)

Approval

Version Number	Date Issued / Reviewed	Approval
2.0	April 2021	CBA N.V. Management Board
3.0	15 March 2023	CBA N.V. Supervisory Board

This Policy is owned by CBA N.V. CEO and must be approved by the Supervisory Board. This Policy will be reviewed and updated every three years and where required by legislative, Group policy or regulatory change.

Please read this policy alongside the CBA N.V Whistleblower Procedure



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1. Purpose

We are committed to fostering a culture where you feel safe to speak up about things that concern you. We encourage you to raise concerns. This could be anything from illegal conduct to behaviour that isn't in line with our Values or Code of Conduct. You are encouraged to speak up and constructively challenge in your everyday duties, including calling out, at the time, behaviour that doesn't feel quite right.

If you don't feel comfortable doing this, or if you feel that you need support and protection, CBA N.V. provides services you can use to report a concern, including anonymously if you wish.

This policy explains:

- how you can report concerns;
- which concerns will be assessed as 'Whistleblower Disclosures' (e.g. fraud, theft, bribery, harassment (sexual or non-sexual), insider trading, making false statements to customers and failing to disclose conflicts of interest, but not customer complaints or work-related grievances that impact you and do not have broader implications for the Group);
- how Whistleblower Disclosures are managed, and what CBA N.V. will do with any concerns that are not Whistleblower Disclosures; and
- how CBA N.V. will support and protect you if you are a Whistleblower.

2. Scope

This policy applies to the CBA Europe N.V. Employees, Seconded and other persons described in this policy as 'Eligible Persons' or 'Eligible Recipients', but it does not apply to customers. This policy does not form part of any contract of employment or any industrial instrument. This policy is available on CBA N.V.'s website and CBA N.V. Policy House.

This policy aligns with the core principles and intent of the CBA Group Whistleblower Policy. Further, it is based on the Dutch Whistleblower Act (*Wet Huis voor klokkenluiders*) and Dutch Financial Supervision Act (*Wet op het financieel toezicht*).

If you have a disclosure related to CBA, refer to the Group Whistleblower Policy.

3. Policy Statement

Any concern you report will be treated seriously and sensitively.

All Whistleblower Disclosures will be handled in accordance with this policy and applicable whistleblower legislation. Any form of actual or threatened victimisation (e.g. termination, demotion, harassment, harm or injury) towards someone as a result of an actual or suspected Whistleblower Disclosure will not be tolerated. This sort of conduct is referred to as 'Detrimental Conduct' in this policy.

CBA N.V. strictly prohibits all forms of Detrimental Conduct against you.



4. Policy Requirements

Reporting a concern

- How can I report a concern?
- Can I report a concern anonymously?
- What will happen when I report a concern?

Assessment

- Will my concern be assessed as a Whistleblower Disclosure?
- Am I an Eligible Person?
- Is my concern about Reportable Conduct?
- What types of concerns are not Reportable Conduct?
- Who is an Eligible Recipient?
- What will happen to my report if it is a Whistleblower Disclosure?
- What will happen to my report if it is not a Whistleblower Disclosure?

Investigation

- What happens during an investigation?

Outcome

- What happens after an investigation?

Protections, support and escalations

- What protections and support will be available if my concerns are assessed as a Whistleblower Disclosure?
- Can I escalate my concerns?
- What happens if I am the subject of a Whistleblower Disclosure?

4.1 Reporting a Concern

How can I report a concern?

You can report a concern via the:

- SpeakUP Hotline – a 24/7 telephone dedicated service
 - Netherlands on a 24-hour hotline on 0800-0270001
 - Overseas on +31 800-0270001;
- Email service managed by an external vendor
 - speakup@speakuphotline.com.au
- SpeakUP Online – a 24/7 secure online portal
 - Disclosures can be raised directly with the Group 24/7 via a secure online portal powered by Whispli, an external vendor to the Group. The information submitted via SpeakUP Online will be lodged directly with the CBA SpeakUP Program and subsequently referred



- to the relevant internal team for management in accordance with relevant privacy procedures.
 - SpeakUP Online offers the ability for those raising concerns to communicate securely with the relevant internal team that is managing the matter.
 - SpeakUP Online can be accessed via one.CBA or at <https://cba.whispli.com/speakuponline>
 - Whistleblower Protection Officer can be contacted by email at HRAmsterdam@cba.com.au
 - You can also make a report to certain individuals who are referred to in this policy as ‘Eligible Recipients’ including:
 - A member of the CBA N.V. Management or Supervisory Board
 - CBA N.V.’s Head of Departments
 - Company Secretary of any Group entity
 - Internal Auditor
 - Although CBA N.V. encourages you to directly report the suspicion of Reportable Conduct to an Eligible Recipient, alternatively, you may also report the suspicion of a Reportable Conduct directly to the competent regulators:
 - the Dutch Authority for the Financial Markets (AFM) www.afm.nl/en ;
 - the Dutch Data Protection Authority (AP) <https://autoriteitpersoonsgegevens.nl/en> ;
 - the Integrity Reporting Desk of De Nederlandsche Bank (DNB) <https://www.dnb.nl/en/contact/reporting-complaints-and-wrongdoing/reporting-integrity-incidents-at-financial-institutions/form-dnb-integrity-reporting-desk/> ; or
 - to the House for Whistleblowers (Het Huis voor Klokkenluiders) in case the Misconduct qualifies as suspected misconduct (vermoeden van een misstand) as set out in article 1 sub d of the Act House for Whistleblower (Wet Huis voor Klokkenluiders) <https://www.huisvoorklokkenluiders.nl/english> ;
- in accordance with the applicable procedures as determined by the competent regulators.

Can I report a concern anonymously?

You can report a concern anonymously and, if the concern is a Whistleblower Disclosure, you will still qualify for Whistleblower protection under this policy. You can continue to remain anonymous after you’ve made a report, including throughout or after any investigation into your concern. You may also refuse to answer questions throughout the process that could reveal your identity.

If you report concerns anonymously to the SpeakUP Hotline or SpeakUP Online, you will receive a unique reference. You can then contact the relevant service to provide further information or request an update at any time.

Although you are not required to do so, you are encouraged to share your identity when reporting a concern as it may make it easier and quicker for the report to be addressed. Remaining anonymous may limit the ability to properly and efficiently investigate or manage your concern.



What will happen when I report a concern?

Once the SpeakUP Program receives your concern, they will:

- acknowledge receipt if there is a means to contact you.
- refer the case to the Whistleblower Investigation Officer, who will assess your concern to determine if it is a Whistleblower Disclosure (assessment is completed within CBA NV after the CBA SpeakUP Program has referred the report).

4.2 Assessment

Will my concern be assessed as a Whistleblower Disclosure?

Your concern will be assessed as a Whistleblower Disclosure (i.e. a concern that is being treated by CBA N.V. as a whistleblowing matter under this policy) if:

- you are an Eligible Person;
- your concern is about Reportable Conduct; and
- you reported your concern to the SpeakUP Hotline, SpeakUP Online or to an Eligible Recipient.

Am I an Eligible Person?

You are an Eligible Person if you are, or have been associated with CBA N.V. as a:

- full-time, part-time or casual employee;
- director or other officer (e.g. a company secretary) of a Group company;
- contractor, consultant, supplier or service provider (or one of their employees or subcontractors);
- secondee, volunteer, or a licensee (or its authorised representative or their employee);
- broker, auditor, trustee, custodian or investment manager (or one of their officers, employees, suppliers or suppliers' employees); or
- relative, spouse or dependent of one of the above (or a dependent of their spouse).

Is my concern about Reportable Conduct?

Reportable Conduct is conduct related to CBA N.V. that:

- amounts to misconduct or an improper state of affairs, such as:
 - fraud or theft (e.g. falsifying loan or credit applications, misappropriating funds);
 - corrupt behaviour (e.g. accepting or offering a bribe, dishonestly taking advantage of an employment position);
 - illegal activities (e.g. sexual assault, engaging in insider trading, manipulating financial markets, laundering money, knowingly making false statements to customers, misreporting financial information, selling illicit drugs, acting violently);
 - a serious or systemic breach of internal policy, including the Code of Conduct (e.g. sexual harassment or failing to disclose conflicts of interests); or
 - negligent acts, a breach of trust or a breach of duty; or



- danger to health, safety of people or the environment
- indicates a significant risk to public safety or the stability of (or confidence in) the financial system; or
- constitutes an offence against, or breach of, certain laws (including the Dutch Civil Act and Dutch Labor Law).

If you report a concern, you should have a reasonable basis for suspecting the information is true. If the information turns out to be incorrect, you won't be penalised and any relevant protections under this policy will still apply. However, if you deliberately make a disclosure that you know isn't true, or is misleading, you will likely breach our Code of Conduct, which may result in disciplinary action. There could also be legal consequences if you knowingly make a false disclosure.

What types of concerns are not Reportable Conduct?

Personal work-related grievances are generally not classified as Reportable Conduct. These are grievances relating to your employment (e.g. remuneration, performance reviews, transfers, promotions or disciplinary action) or to an interpersonal conflict between you and another employee. Personal work-related grievances tend to have implications for you personally, but do not have any other significant or broader implications for CBA N.V.

To raise a personal work-related grievance, please contact CBA N.V. Human Resources (HRAmsterdam@cba.com.au).

Although not usually the case, personal work-related grievances may amount to Reportable Conduct under this policy if, for example, they:

- indicate a systemic issue; or
- relate to actual or threatened Detrimental Conduct against a person because they have disclosed or are believed or suspected to have disclosed, or be planning to disclose, other Reportable Conduct.

Customer complaints are another type of concern that are generally not classified as Reportable Conduct.

If you are a customer and are not satisfied with our products, services, staff or complaint handling process, please contact CBA N.V. with your concern via phone, email, online or post. Details are available through the CBA N.V. Complaints Handling Process which can be accessed through: <https://www.commbank.com.au/about-us/our-company/international-branches/european-union.html>

What will happen if my concern is assessed as a Whistleblower Disclosure?

If your concern is assessed as a Whistleblower Disclosure, the concern will be managed by the Whistleblower Investigation Officer. The Whistleblower Investigation Officer is either CBA N.V. Head of Compliance and/or CBA N.V. Legal Counsel.

The Whistleblower Investigation Officer will review the Whistleblower Disclosure to decide whether it should be investigated. Sometimes we may decide not to investigate a Whistleblower Disclosure or



part of it – for example, if we have previously investigated the allegations in the disclosure and there is no new material. We will inform you of this decision if you can be contacted.

It is important to note that Eligible Recipients are typically not in a position to conduct a review or an investigation into the concerns you raise because they are generally not trained in or resourced for reviews or investigations.

What will happen if my concern is assessed as not being a Whistleblower Disclosure?

If your concern is assessed as not being a Whistleblower Disclosure, the Whistleblower Investigation Officer will refer the concern to the most appropriate area of CBA N.V. or Group for management (e.g. the business unit the subject of the concern).

4.3 Investigation

What happens during an investigation?

If the Whistleblower Investigation Officer decides that your Whistleblower Disclosure will be investigated, the Whistleblower Investigation Officer will conduct or commission an investigation with the support of internal or external resources as appropriate.

Investigations follow an objective and fair process, and will be conducted independently of you and the person(s) the subject of the Whistleblower Disclosure. We will seek to conduct the investigation as quickly as the circumstances allow. The Whistleblower Investigation Officer will update you on the progress of the investigation (if you can be contacted).

4.4 Outcome

What happens after an investigation?

Once an investigation ends, the Whistleblower Investigation Officer or investigator will issue a report on, or summary of, the findings and the evidence on which the findings are based to the relevant management or decision maker. Depending on the circumstances of the Whistleblower Disclosure, and any privacy or confidentiality concerns, the Whistleblower Investigation Officer will inform you, and/or the person who is subject of the Whistleblower Disclosure, of the findings; however, neither you nor the person who is the subject of the Whistleblower Disclosure will be provided with a copy of the investigation report / summary.

4.5 Protections, support and escalations

What protections and support will be available if my concerns are assessed as a Whistleblower Disclosure?

We understand that you may be concerned about being identified or the potential for repercussions as a result of reporting your concerns. Under the Dutch Civil Code, CBA N.V. is not allowed and will not



disadvantage you (including but not limited to demote, suspend, threaten or end your employment) as a result of reporting suspected misconduct in good faith during and after the handling of the reported concern in question. The support and protections outlined below are available to you irrespective of whether the concerns reported in your Whistleblower Disclosure are substantiated. However, although reprisals are serious violation of this policy, it does not provide automatic immunity to complicated matters requiring external investigation and/or judicial proceedings. Therefore, if you have any reasonable doubts that reporting your concerns may lead to repercussions, you can inform the CBA N.V. Whistleblower Protection Officer.

Protecting your identity

Your identity (or any information that would be likely to identify you) will not be shared with anyone except in the following circumstances:

- you provide consent; or
- it is reasonably necessary for investigating a matter raised in your Whistleblower Disclosure and:
 - the information shared is not of your identity as the Whistleblower; and
 - we have taken all reasonable steps to reduce the risk that you will be identified from the information; or
- the disclosure is otherwise permitted or required by law

The reasonable steps we will take to protect your identity and information in your Whistleblower Disclosure that is likely to identify you, may include:

- securely storing all paper and electronic documents and other materials relating to the Whistleblower Disclosure;
- where possible, communicating with you to help identify the aspects of your concerns that could inadvertently identify you;
- potentially using a pseudonym to refer to you; and
- providing training and awareness about the confidentiality requirements and consequences of breaching confidentiality to those involved in receiving, handling and investigating Whistleblower Disclosures.

Note that while we will take all reasonable steps to protect your identity, it may be difficult if your concern relates to information that only a few people know about or was told to you confidentially.

Non-identifying information about your Whistleblower Disclosure may also be shared with senior management or our governance bodies (for example, the CBA N.V. Management Board, CBA N.V. MCG, CBA Board or the CBA Misconduct Governance Committee)

The consent for data processing is not required, though all other General Data Protection Regulation should be met.



Protecting you against Detrimental Conduct

We will take all reasonable steps to protect you from Detrimental Conduct. Detrimental Conduct means any actual or threatened conduct against you or another person for making, or proposing to make, a Whistleblower Disclosure, or because you have been involved in the investigation of a Whistleblower Disclosure. It includes:

- termination, suspension, demotion or involuntary transfer;
- harassment (sexual or non-sexual), bullying or intimidation;
- over or under work;
- missed promotion;
- denied training opportunities;
- undermined authority or heavily scrutinised work;
- harm or injury, including psychological harm; and
- any other conduct that constitutes victimisation

You will have access to the Whistleblower Protection Officer as provided in this policy. The Whistleblower Protection Officer will:

- assess and monitor any risks of Detrimental Conduct; and
- take reasonable steps to protect you from those risks. These reasonable steps may include making modifications to your workplace or the way you perform your work duties.

If, despite these reasonable steps, Detrimental Conduct occurs, it will not be tolerated and appropriate action (e.g. disciplinary action) will be taken against those responsible.

Not all conduct will amount to Detrimental Conduct, such as managing poor work performance in line with the Group's performance management procedures, disciplinary action in response to misconduct unrelated to your Whistleblower Disclosure (or where you intentionally make a Whistleblower Disclosure that you know isn't true, or is misleading), or action that is reasonable to protect you from Detrimental Conduct (for example, moving you from your immediate work area to another office).

We may, at our discretion, grant you immunity from internal disciplinary proceedings relating to matters that come to light as a result of your Whistleblower Disclosure.

Wellbeing

The Whistleblower Protection Officer will assist you in maintaining your wellbeing, which may include providing strategies to minimise and manage stress resulting from making the Whistleblower Disclosure or referring you to counselling and/or other professional services as appropriate.

In addition to support available from the Whistleblower Protection Officer, if you are a current or former employee of CBA N.V. (or their immediate family member), you are able to access a confidential counselling service, Meijers Vitaal (E.smit@meijersvitaal.nl; ph: +31641423376/ +31208000558). Upon request, this service may also be extended to other Eligible Persons.



Can I escalate my concerns?

You should immediately tell the Whistleblower Protection Officer if:

- you are experiencing (or think you might experience) Detrimental Conduct; or
- you are concerned about the actions being taken under this policy. For example, if you think there has been a breach of your protection as a Whistleblower, or if you are concerned about an assessment made by the Whistleblower Investigation Officer.

The Whistleblower Protection Officer will review the concerns you have raised and, if material, escalate them to a member of the CBA N.V. Misconduct Governance Committee (MGC). In respect of other concerns, the Whistleblower Protection Officer may take such action as they consider appropriate. However, it may not be possible to take action if you wish to remain anonymous.

You can ask that the Whistleblower Protection Officer to escalate your concerns to the CBA N.V. MGC or other appropriate governance committee if you:

- are not satisfied with a decision of the Whistleblower Investigation Officer to not conduct an investigation;
- are not satisfied with the findings of the investigation;
- consider that the Whistleblower Protection Officer has not appropriately escalated the concerns that you raised with them; or
- consider that this policy has not been followed, for example if there has been a breach of your Whistleblower protections.

If you want to escalate your concern, you must put your concern in writing and ask the Whistleblower Protection Officer to send it to a member of the Management Board or another governance committee. When the Management Board or governance committee considers your concern, they are not required re-open or re-investigate the Whistleblower Disclosure.



What happens if I am the subject of a Whistleblower Disclosure?

If you are the subject of a Whistleblower Disclosure we will ensure that you receive fair treatment and an impartial investigation.

You may be informed of the allegations against you and, if so, you will be provided with an opportunity to respond to the allegations. Where you are made aware of the investigation, you will be informed of the investigation findings (subject to confidentiality requirements), however you will not be provided with a copy of the investigation report.

How are conflicts of interest managed under the policy?

All people with roles under this policy must disclose any actual, potential or perceived conflicts of interest that they have in relation to a Whistleblower Disclosure to the CBA N.V. MGC and manage those conflicts in accordance with the CBA N.V. Conflict of Interest Policy.



Roles and Responsibilities

Roles	Responsibilities
<p>CBA N.V. MGC (including its members individually). Includes:</p> <ul style="list-style-type: none"> • CBA N.V. Management Board (Chaired by the CEO) • CBA N.V. Head of Compliance • CBA N.V. Head of HR; and • Other persons appointed to the MGC, if and when needed. <p>In the event that members of the Management Board are conflicted, they may be substituted by members of the Supervisory Board</p>	<ul style="list-style-type: none"> • Championing the Whistleblower program and overseeing the implementation and effectiveness of the program • Accountable for any escalations and provide guidance where required on any actions stemming from the disclosure • Co-ordinating a whistleblower training program (which may include face-to-face training, written materials and/or online learning modules) for Eligible Recipients, service providers and Staff Members involved in managing and investigating Whistleblower Disclosures • Provide feedback to the SpeakUP program, where required, on matters regarding the SpeakUP Hotline and SpeakUP Online • Implementing and complying with the principles set out the CBA N.V. Whistleblower Policy and the CBA N.V. Whistleblower Procedure • Compliance / regulatory reporting of Whistleblower matters
<p>Whistleblower Investigation Officer (WIO) Any of, or a combination of the following:</p> <ul style="list-style-type: none"> • CBA N.V. Head of Compliance • CBA N.V. Head of Legal • any other Staff Member determined by the CBA N.V. Management Board to be appropriately skilled to investigate the disclosure 	<ul style="list-style-type: none"> • Determining whether Whistleblower Disclosures should be investigated and, if so, conducting or commissioning an investigation in a timely, fair and objective manner (including by remaining independent of the Whistleblower and the person(s) about whom an allegation has been made) • Providing feedback on the progress and timeframes of the investigation to the Whistleblower, as appropriate • To the extent permitted, informing the Whistleblower and/or person(s) subject of the Whistleblower Disclosure of the investigation findings
<p>Whistleblower Protection Officer (WPO)</p> <ul style="list-style-type: none"> • CBA N.V. Head of HR (or delegate) 	<ul style="list-style-type: none"> • Assessing and monitoring any risks of Detrimental Conduct and taking reasonable steps to protect Whistleblowers from those risks • Assisting in maintaining the wellbeing of Whistleblowers



Roles	Responsibilities
	<ul style="list-style-type: none"> • Maintaining the confidentiality of Whistleblowers, where relevant • Reviewing concerns raised by Whistleblowers to the WPO and, if material, escalating the concerns to a member of the CBA N.V. MGC or other appropriate Group governance committee. For non-material concerns, taking such action as the WPO considers appropriate • Providing secretariat services for the MGC • Implementing the Whistleblower training program
Whistleblower Reporting Officer (WRO) <ul style="list-style-type: none"> • CBA N.V. Head of Compliance 	<ul style="list-style-type: none"> • Overseeing assessment of Whistleblower Disclosures • Overseeing the fulfilment of reporting requirements to the Risk and Audit Committee and other appropriate Group governance committees. • Overseeing the management of a secured central repository for recording of Whistleblower Disclosures • Compliance / Regulatory Reporting of Whistleblower matters where applicable • Ensuring timely and accurate capture of SpeakUP Program-related incidents, issues and controls in RiskinSite • Engaging Line 2 BU/SU Risk in relation to any instances of non-compliance with this policy and the CBA NV Whistleblower Procedure • Provide significant Whistleblower Disclosures made under this policy to the CBA SpeakUP Program team for inclusion in CBA Misconduct Governance Committee and Board Audit Committee reporting
Eligible Recipient <ul style="list-style-type: none"> • A member of the CBA N.V. Management or Supervisory Board • CBA N.V.'s Head of Departments • Company Secretary of any Group entity • Internal Auditor 	<ul style="list-style-type: none"> • Receiving and referring Whistleblower Disclosures in accordance with this policy, including seeking consent (preferably in writing) to share a Whistleblower Disclosure with the WIO in order for the concern to be assessed and, if appropriate, investigated • Seeking legal advice including from CBA N.V. Head of Legal • Completing annual Whistleblower training



5. Breach of Policy

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 legislation. This policy must be read together with the CBA N.V. Whistleblower Procedure. Failure to follow the procedure may amount to a breach of this policy.

Escalation

Any alleged breach of this policy will be taken seriously and, if appropriate, will be separately investigated. Potential or realised breaches of obligations outlined in this policy must be escalated according to the CBA Europe N.V. Compliance Incident Procedure.



Appendix A: Glossary

In this Policy, defined terms are capitalised. Those terms have the meaning given to them below.

CBA	Commonwealth Bank of Australia ACN 123 123 124.
CBA N.V.	Commonwealth Bank of Australia (Europe) N.V., Chamber of Commerce 72946520
Contractors	Individuals who are not employees, and external corporations or organisations, engaged to perform services for the Group.
Detrimental Conduct	Any actual or threatened conduct against you or another person for making, or proposing to make, a Whistleblower Disclosure, or because you have been involved in the investigation of a Whistleblower Disclosure.
Eligible Person	An individual listed on page 7 of this policy: 'Am I an Eligible Person?'.
Eligible Recipient	A person or channel (SpeakUP Hotline or SpeakUP Online) designated in this policy as an avenue through which a disclosure can be made in order to qualify for protections under this policy.
Employee	Person who performs or has performed work for CBA N.V. pursuant to an employment contract or a person who performs or has performed work for CBA N.V. other than in the context of an employment relationship.
Group	CBA and its Subsidiaries, and onshore and offshore controlled entities (being entities that are subject to the control of CBA in terms of section 50AA of the Corporations Act).
Internal Auditor	The Internal Auditor is in charge of the Internal Audit Function, which is the Third Line of Accountability as described in the CBA NV's Governance Manual and Risk Management Framework. The Internal Auditor has a direct reporting line to the RAC, while maintaining an administrative reporting line to the CEO and CBA Group Auditor.
Risk & Audit Committee (RAC)	A Supervisory Board committee established to assist the Supervisory Board in discharging its responsibilities on a range of matters – please refer to Risk and Audit Charter.
Reportable Conduct	Please refer to page 7: 'Is my concern about Reportable Conduct?'
Seconded	An individual who is seconded temporarily to CBA N.V. but who is employed by an external organisation.
SpeakUP Program	A CBA program to provide safe avenues and formal processes to enable Staff Members and third parties to raise issues without fear of reprisal.
Staff Member	A full-time or part-time employee of, or Contractor or Seconded to, CBA N.V.
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.
You	Reference to 'You', 'you', 'your' refer to a Whistleblower or someone contemplating making a disclosure

