

Speak Up Policy

1. What is the purpose of this Policy?

DuluxGroup Limited and its subsidiaries (**DuluxGroup**) are committed to conducting business honestly, with integrity, and in accordance with DuluxGroup's values and standards of expected behaviour. The purpose of this Policy is to:

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

DuluxGroup will not tolerate anyone being discouraged from Speaking Up or being subjected to a detriment because they want to Speak Up or they have done so. Disciplinary action, up to and including termination of employment or engagement, will be imposed on anyone shown to have caused detriment to a person because they want to, or have Spoken Up.

2. Who does this Policy apply to?

This Policy applies to all of DuluxGroup's current and past:

- employees;
- officers;
- contractors and consultants;
- suppliers (including employees of suppliers); and
- associates,

Spouses, relatives, dependents (including their spouse's dependents) can also Speak Up and are protected by this Policy. However, competitors, customers, consumers and clients cannot Speak Up under this Policy.

People must not discourage anyone from Speaking Up (including their, spouses, relatives and dependents) and to do so will itself breach this Policy and may be reported to law enforcement officials. If you are told not to raise a concern, even by a person in authority, please disclose this to a different Recipient.

3. What is Speaking Up?

Speaking Up means telling a **Recipient** if you have reasonable grounds to suspect that **Potential Misconduct** has occurred or is occurring.

Potential Misconduct is any suspected or actual misconduct or improper state of affairs or circumstances in relation to DuluxGroup.

This may or may not include a breach of law or information that indicates a danger to the public or to the financial system.

You should Speak Up even if you are unsure if something is Potential Misconduct.

Potential Misconduct does **not** generally include **personal work-related grievances** (such as a conflict between you and another employee or manager).

These grievances should be raised via your manager or human resources representative. Please refer to the Appropriate Workplace Behaviour Policy for more information.

Examples of Potential Misconduct include, but are not limited to:

- breach of laws or regulations;
- breach of the Code of Conduct or other DuluxGroup policies, standards or codes;
- criminal activity;
- bribery or corruption;
- conduct endangering health and safety, or causing damage to the environment;
- dishonest or unethical behaviour;
- conflicts of interest;
- anti-competitive behaviour;
- theft;
- financial fraud or mismanagement;
- unauthorised use of DuluxGroup's confidential information;
- conduct likely to damage DuluxGroup's financial position or reputation; and
- deliberate concealment of the above.

The Potential Misconduct not only relates to our employees but extends to anyone DuluxGroup does business with such as our contractors, customers and suppliers.

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

DuluxGroup realises it is a big step to Speak Up. You are supported by us in providing information of Potential Misconduct and through Speaking Up, you will be helping DuluxGroup to minimise Potential Misconduct.

4. Who can I tell? – options for resolution outside of this Policy

Anyone who experiences or witnesses Potential Misconduct or any other matter not covered by this Policy, is encouraged to report it as soon as possible. There are a number of ways that issues can be resolved outside of this Policy.

Self-Resolution

If you feel comfortable, speak directly to the person, tell them your concerns about the Potential Misconduct or personal work-related grievance and ask them to stop. This may resolve the problem. You should keep detailed notes of any concerns and steps you take.

Speak with EAP

If a concern cannot be resolved by direct discussion or you do not feel comfortable resolving it yourself, you can seek guidance from the Employee Assistance Program.

EAP can be contacted on 1300 361 008 (AU) / 0800 327 669 (NZ).

Please note: reporting the matter to EAP, while confidential and de-identified, is not a disclosure that has the whistleblower protections listed under this Policy. For the whistleblower protections to apply, please refer to section 5 listed below.

Speak with a Manager / HR People Services

Discuss your concerns with a manager (other than DGE member) or HR People Services. This will generally lead to the quickest and most effective resolution.

HR People Services can be contacted on (AU) +61 3 9263 5020 / +64 4 576 6379 (NZ).

Please note: reporting the matter to a manager or HR People Services is not a disclosure that has the whistleblower protections listed under this Policy.

5. Who can I tell? – options for Speaking Up under this Policy

The following Speak Up options are available to you to make a complaint or obtain more information prior to making a complaint. In Speaking Up through one of these channels, the whistleblower protections may apply if the disclosure relates to Potential Misconduct.

Speak-Up Line

The DuluxGroup Speak-Up Line is an outsourced independent service developed to provide people with an opportunity to anonymously report Potential Misconduct within the organisation. The Speak-Up Line will pass on the information it receives (subject to confidentiality requirements) to the Company Secretary or the Speak Up Co-ordinator within 24 hours.

If you would like to report Potential Misconduct through the DuluxGroup Speak-Up Line, you can report it in one of two ways:

Telephone

Telephone	Region	Language
1800 065 506	Australia	English
+61 3 9431 2210	Outside Australia	English, Mandarin, Cantonese, Bahasa Melayu, Pidgin English, Hindi, French

These telephone lines are open 24 hours a day. You will be connected to the Speak-Up Line message service which will enable you to leave a recording of relevant information about the Potential Misconduct.

PLEASE NOTE: Calls from outside Australia will be charged commencing once the call is answered by the message service.

Email

You can send an email to: duluxgroupsspeakup@tremac.net.au

Please note that DuluxGroup email accounts can be accessible by others at DuluxGroup from time to time. If you are uncomfortable using the DuluxGroup network, you may wish to consider utilising an email address external to the DuluxGroup network when sending your email.

Other Recipients You Can Contact

If you would prefer to Speak Up without using the Speak-Up Line, you can contact one of the following Recipients.

Recipient Name	Contact details
Your local Human Resources Manager	+61 3 9263 5678
Group Risk Manager	+61 3 9263 5678
General Counsel	+61 3 9263 5678

Recipient Name

Contact details

Any member of the DuluxGroup
Executive

+61 3 9263 5678

The role of the above Recipients is to ensure that the information is heard by DuluxGroup and proper follow-up occurs, as well as to ensure you feel supported and protected.

Where appropriate, these Recipients will refer disclosures to the Company Secretary or the Speak Up Co-ordinator to oversee DuluxGroup's response. These Recipients will generally not be involved in DuluxGroup's response, but they may have an ongoing role in keeping you updated on relevant developments.

People other than the Recipients listed above

While we encourage people to utilise the internal channels noted above, you can also Speak Up to individuals or organisations outside of DuluxGroup or the Speak-Up Line. These are listed in the separate Fact Sheets specific to your relevant country.

6. What information should I provide to the Speak-Up Line or Other Recipients?

You should provide as much information as possible, including details of:

- the Potential Misconduct;
- people involved;
- dates, time and locations of incident/s;
- money or assets involved;
- how often the incident/s has occurred;
- if any more evidence may exist; and
- any indication of whether you have already reported the incident internally or through any other channels.

7. Can I make an anonymous disclosure?

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

You are encouraged to provide your name because it will make it easier for us to address your disclosure (for example, the context in which you observed the Potential Misconduct is likely to be useful, and we may seek more information to assist an investigation).

If you do not provide your name, your disclosure will be assessed in the same way whether or not you provide your name. However, please be aware that an investigation may not be possible unless sufficient information is provided, and it may make it difficult to offer you the same level of practical support if we do not know your identity. It is for this reason that if you would prefer to remain anonymous you are encouraged to maintain ongoing two-way communication with us in case we have any follow-up questions for you or to update you in particular circumstances.

8. How will DuluxGroup respond?

All disclosures made under this Policy will be received and treated sensitively and seriously. They will be dealt with promptly, fairly and objectively. The general process after a disclosure is made is set out below.



It should also be noted that:

- DuluxGroup's response to a disclosure will vary depending on the nature of the disclosure (including the amount of information provided). Your disclosure may be addressed and resolved informally or through formal investigation.
- While Speaking Up does not guarantee that the disclosure will be formally investigated, all reports will be properly assessed and considered by DuluxGroup and a decision made as to whether they should be investigated.
- Disclosers may be told how DuluxGroup has decided to respond, including if an investigation will be conducted and any investigation outcome. This may not occur until the investigation has been concluded. However, it may not always be appropriate to provide this information, and may not be possible unless your contact details are provided.
- Any investigations commenced will be conducted in a timely manner and will be fair and independent from any persons to whom the disclosure relates.
- All employees, suppliers and contractors must cooperate fully with any investigations.
- When appropriate, a person being investigated will be provided with details of the disclosure that involves them and be given an opportunity to respond.
- Where an investigation identifies a breach of DuluxGroup's Code of Conduct or internal policies or procedures, disciplinary action will be taken where appropriate. This may include but is not limited to terminating or suspending the employment or engagement of the person(s) involved in the misconduct.

9. What protections exist for disclosers who Speak Up?

This section outlines how you are protected by Speaking Up under this Policy. A more detailed summary of the legal protections for disclosers can be found in the Fact Sheets specific to your country.

Protecting your identity

DuluxGroup's priority is to protect the identity of people who Speak Up. If you Speak Up, your identity (and any information we have because of your disclosure that someone could likely use to work out your identity) will only be disclosed if you give your consent to DuluxGroup to disclose that information or the disclosure is allowed or required by law.

Protecting you from detriment

No person may cause detriment to someone else (or threaten to do so) because of a belief that person has spoken up or will Speak Up. Examples of detriment include discrimination, harassment, causing physical or psychological harm and damaging property.

You should tell a Recipient listed in section 5 if you or someone else is being, or has been subjected to detrimental conduct or you believe there has been a breach of

confidentiality in how the matter has been handled. DuluxGroup will treat this very seriously and it constitutes a breach of this Policy.

Any person involved in detrimental conduct will be subject to disciplinary action where appropriate, including but not limited to termination of employment or engagement. In some circumstances, this may also be a criminal offence punishable by imprisonment. Any person that has caused detriment to someone else may be referred to law enforcement authorities.

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

Other protections available

DuluxGroup is committed to making sure that you are treated fairly and do not suffer detriment because you Speak Up. The protections offered will depend on things such as the Potential Misconduct and people involved. Protections may include the following:

- monitoring and managing the behaviour of other employees;
- relocating employees (which may include the people alleged to have been involved in the Potential Misconduct) to a different division, group or office;
- offering you a leave of absence or flexible workplace arrangements while a matter is investigated;
- facilitating access for current or former employees to access DuluxGroup's Employee Assistance Program, counselling or other support services; and/or
- rectifying any detriment that you have suffered.

Contact details of the EAP is listed in section 4 of this Policy.

DuluxGroup will look for ways to support all people who Speak Up, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. Where this Policy cannot be applied to non-employees (for example, because DuluxGroup cannot itself offer flexible workplace arrangements to a supplier), DuluxGroup will still seek to offer as much support as practicable.

10. Reporting

The Speak-Up Committee will meet to monitor the effectiveness of this Policy and responses to issues raised. The Speak-Up Committee will summarise activity outcomes, trends and recommendations to the DuluxGroup Executive. The Speak Up Committee will provide to the DuluxGroup Executive a summary of disclosures. The Board will be provided additional information about any material incidents raised.

Speak-Up Committee

The Speak-Up Committee comprises the:

- Executive General Manager – Human Resources;
- Executive General Manager – Supply Chain;
- Group Risk Manager;
- Group Safety & Sustainability Manager;
- Senior Legal Counsel; and
- Head of Workplace Relations.

The purpose of the Speak-up Committee is to:

- monitor activity and trends;
- review issues and the adequacy of the investigation and follow up; and
- recommend changes to this Policy to the Board.

11. Further information

Any questions about this Policy or the process of Speaking Up can be referred to any member of the Speak Up Committee (see section 10 for a list of the Committee members) or the Company Secretary.

This Policy will be available on DuluxGroup's public website and on Our Place. A hard copy of the Policy can be obtained by contacting the Company Secretary.

12. Variation

This policy may be varied from time to time, or cancelled at any time, by DuluxGroup in its sole discretion. This policy is not in any way incorporated or form any part of an employee's contract of employment or any contractor, consultant, supplier or provider's agreement with DuluxGroup.

Document control

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