

MUFG Pension & Market Services Whistleblower Policy

AUGUST 2026

Document Name:	MUFG Pension & Market Services Whistleblower Policy
Policy Category:	Compliance
Approver:	Executive Risk & Compliance Committee
Executive Sponsor:	Chief Risk Officer
Policy Owner (Author):	General Manager, Enterprise Risk
Approval Date:	August 2026
Review Frequency:	Generally, every two years unless required more frequently
Effective Date:	August 2026
Next Review Date:	August 2028
Document Classification:	Public
Contact for Questions:	Head of Framework, Policy & Group Compliance

TABLE OF CONTENTS

- 1. WHAT IS THIS POLICY?.....4
- 2. WHY DO WE NEED THIS POLICY?4
- 3. WHO DOES THE POLICY APPLY TO?5
- 4. HOW TO COMPLY WITH THIS POLICY?5
 - 4.1 Protections of Whistleblowers 5
 - 4.2 How to make a Disclosure of Reportable Conduct 6
 - 4.2.1 Disclosure Channel 1 – Internal..... 7
 - 4.2.2 Disclosure Channel 2 - FairCall 7
 - 4.2.3 Alternative Disclosure Channels - External..... 8
 - 4.3 How will a Disclosure of Reportable Conduct be handled? 8
 - 4.4 Training and access to this Policy..... 10
- 5. ROLES AND RESPONSIBILITIES10
- 6. POLICY MONITORING AND REPORTING11
- 7. NON-COMPLIANCE12
- 8. RELATED DOCUMENTS AND SOURCES12
- 9. DEFINITIONS.....13
- 10. DOCUMENT CHANGE HISTORY15

1. WHAT IS THIS POLICY?

The Whistleblower Policy (**Policy**) sets out the approach of MUFG Pension & Markets Services Holdings Pty Ltd and its subsidiaries (**MUFG Pension & Market Services**) to encourage and support the **Disclosure of Reportable Conduct** and protect **Whistleblowers** from any retribution or other detriment that may arise as a result of their Disclosure. MUFG Pension & Market Services does not tolerate **Reportable Conduct** under any circumstances.

The Policy supports the MUFG Pension & Market Services Code of Conduct and Ethics which sets the standards for the way we work at MUFG Pension & Market Services.

This Policy does not cover the disclosure of individual personal workplace grievances such as:

- interpersonal conflict between a **MUFG Pension & Market Services Person** and another MUFG Pension & Market Services Person;
- a decision relating to the engagement, transfer or promotion of a MUFG Pension & Market Services Person;
- a decision relating to the terms and conditions of employment or engagement of a MUFG Pension & Market Services Person;
- a decision to suspend or terminate the employment or engagement of a MUFG Pension & Market Services Person, or otherwise to discipline a MUFG Pension & Market Services Person;

unless such disclosure also includes a **Disclosure of Reportable Conduct**. If a MUFG Pension & Market Services employee has a workplace grievance, they must consult the **MUFG Pension & Market Services Grievance Policy** available on the MUFG Pension & Market Services intranet page.

Words in **bold** have the meaning stated in Section 9 (Definitions) and appear in bold when first used.

2. WHY DO WE NEED THIS POLICY?

MUFG Pension & Market Services is committed to requiring and supporting ethical and responsible behaviour. MUFG Pension & Market Services recognises the important role whistleblowing can play in the early detection of Reportable Conduct. MUFG Pension & Market Services also recognises that individuals who are considering disclosing Reportable Conduct may hold concerns of retribution or other detriment and require an assurance of protection.

MUFG Pension & Market Services has adopted the following principles in relation to its whistleblowing program:

- MUFG Pension & Market Services fosters a culture of corporate compliance and ethical behaviour, and encourages the reporting of actual or suspected conduct, which is illegal, unacceptable, or undesirable (see definition of Reportable Conduct in Section 9);
- MUFG Pension & Market Services will support and protect any MUFG Pension & Market Services Whistleblower that reports Reportable Conduct and is acting honestly and acting with **Reasonable Grounds** for suspecting or believing the occurrence of the Reportable Conduct;
- MUFG Pension & Market Services may not be able to extend the full level of protections and support set out in this Policy to Whistleblowers who are not employed by MUFG Pension & Market Services;
- MUFG Pension & Market Services will conduct investigations into Reportable Conduct in an objective, fair, thorough, and confidential manner. All investigations will have an appropriate level of independence (e.g. investigation should not be led by the direct line manager of the person who is subject of the Disclosure) from the source of the Reportable Conduct. This may include internal investigation led by someone from a different reporting line or external investigations, depending on the nature of matter. Appropriate corrective action will be taken as warranted by the results of the investigation;
- MUFG Pension & Market Services will not take any action against a Whistleblower where a Disclosure of Reportable Conduct is unable to be substantiated or is found to be untrue, provided

the Whistleblower acts on Reasonable Grounds to suspect concerns of Reportable Conduct;

- MUFG Pension & Market Services may pursue legal or disciplinary action where a Whistleblower makes a report knowing it to be untrue or misleading;
- Whistleblowers may qualify for protection if Disclosure of Reportable Conduct are made to legal practitioners, or regulatory bodies;
- MUFG Pension & Market Services will not prevent (whether through a confidentiality agreement or otherwise) a Whistleblower from making a Disclosure of Reportable Conduct to a regulator, or legal counsel; and
- Whistleblowers are encouraged to contact a **Whistleblowing Protection Officer (WPO)** or FairCall or an independent legal adviser prior to making a **Public Interest Disclosure** or **Emergency Disclosure** in order to understand the criteria that qualifies those types of Disclosure for protection. Refer to the definitions of Public Interest Disclosure and Emergency Disclosure in Section 9 'Definitions' for protection criteria.

3. WHO DOES THE POLICY APPLY TO?

This Policy applies to MUFG Pension & Market Services and all MUFG Pension & Market Services Persons globally. MUFG Pension & Market Services Persons include current and former directors, officers, employees, contractors, consultants, suppliers, third party providers, secondees and advisers of MUFG Pension & Market Services, and includes relatives and dependents of any of those persons. Any MUFG Pension & Market Services Person can make a Disclosure of Reportable Conduct under this Policy.

Compliance with the Policy is mandatory, and no exceptions are allowed.

4. HOW TO COMPLY WITH THIS POLICY?

4.1 Protections of Whistleblowers

Whistleblowers who act on Reasonable Grounds to suspect concerns of Reportable Conduct must be supported and protected. Whistleblowers are afforded certain legal protections, and whilst these vary by jurisdiction, they generally include:

- **Protection from legal action:** Provided the Whistleblower acts on Reasonable Grounds to suspect concerns of Reportable Conduct, he/she will not be subject to any civil, criminal or administrative legal action from MUFG Pension & Market Services for making a Disclosure under this Policy.
- **Protections from detrimental conduct:** MUFG Pension & Market Services will not engage in any detrimental conduct (e.g. terminate, demote, suspend, threaten, harass or in any other manner discriminate against, or cause detriment) against a Whistleblower as a result of their Disclosure. If a Whistleblower is involved in the Reportable Conduct, MUFG Pension & Market Services may take the voluntary disclosure into consideration in determining any disciplinary action however cannot guarantee immunity from criminal prosecution.
- **Protection of confidentiality:**
 - Whistleblowers have the right to remain anonymous or to communicate using a pseudonym. That is, Whistleblowers are not required to disclose their identity.
 - MUFG Pension & Market Services will take all reasonable steps to protect the Whistleblower's identity. The identity of Whistleblowers who wish to remain anonymous is omitted from all reports relating to the Disclosure of Reportable Conduct. A Whistleblower's identity will only be disclosed if:
 - the Whistleblower consents to information being revealed; or
 - disclosure is allowed or required by law; or
 - disclosure is necessary to prevent or lessen a serious threat to a person's health or safety.

- MUFG Pension & Market Services will take all reasonable steps to ensure that any records relating to a report of Reportable Conduct are stored securely. Access to the information is restricted to staff necessary to access for the purpose of investigating the Disclosure or hosting the records, such as the WPO, the WIO, and select members of the Enterprise Risk Management (**ERM**) team in Line 2 Risk & Compliance, who centrally store all records relating to Disclosures;
- **Legal protection:** Some laws provide additional legal protections and remedies for certain Disclosures made in accordance with the legislative provisions. Legal protections may vary in different jurisdictions. They may include:
 - making it an offence for a detrimental conduct against a Whistleblower, or for disclosing a Whistleblower's identity without their consent,
 - protection against certain legal actions including civil, criminal and/or administrative liability, or
 - ability for a Whistleblower to seek compensation and other remedies through the courts if they suffered loss, damage, or injury because of a Disclosure and MUFG Pension & Market Services failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

4.2 How to make a Disclosure of Reportable Conduct

MUFG Pension & Market Services provides an environment which encourages people to appropriately raise concerns. Employees are encouraged to refer to the *Speak Up* intranet page for the channels to raise different types of concerns.

Disclosure of Reportable Conduct must be based on information that is directly known to the person making the Disclosure. The Whistleblower must act on Reasonable Grounds to suspect the alleged Reportable Conduct has occurred or is likely to occur. When making a Disclosure on Reasonable Grounds, the Whistleblower can qualify for protections outlined in section 4.1 even if the Disclosure turns out to be incorrect.

When making a Disclosure of Reportable Conduct, Whistleblowers are encouraged to clearly communicate that they are making a Disclosure of Reportable Conduct and to provide as much information as possible, including:

- any known details related to the Reportable Conduct (e.g. date, time, location, name of person(s) involved,
- evidence (e.g. documents or emails),
- names of possible witnesses) and
- any steps that have been taken to disclose the matter elsewhere in an attempt to resolve the concern.

Whistleblowers are not expected to investigate their concerns to prove their validity prior to making a Disclosure.

Whistleblowers can make the Disclosure anonymously or via a pseudonym and still qualify for protections outlined in section 4.1.

Disclosure Channels

4.2.1 DISCLOSURE CHANNEL 1 – INTERNAL

Disclosure of Reportable Conduct may be made by contacting one of the designated Whistleblowing Protection Officers (**WPOs**) set out below:

WPO	CONTACT DETAILS
Fergus Duggan MUFG Pension & Market Services Chief People Officer	Email: fergus.duggan@au.mpms.mufig.com
Raj Singh MUFG Pension & Market Services Chief Risk Officer	Email: raj.singh@au.mpms.mufig.com
Neelam Patel MUFG Pension & Market Services General Counsel	Email: neelam.patel@eu.mpms.mufig.com
Shigehiro Wakamoto Chief Shareholder & Governance Officer	Email: shigehiro.wakamoto@au.mpms.mufig.com

Disclosures could also be made to other senior leadership, or a member of the internal audit team. Where a senior leadership or internal audit team member receives a report, they must inform the Whistleblower that the matter will be referred to a WPO without delay and the information will also be shared with select members within ERM for record keeping and reporting purposes. In the event that the Whistleblower wishes to remain anonymous, the recipient of the Disclosure must keep the Whistleblower's identity confidential, unless disclosure is required by law or is necessary to prevent or lessen a serious threat to a person's health or safety.

4.2.2 DISCLOSURE CHANNEL 2 - FAIRCALL

Disclosure of Reportable Conduct may also be made through FairCall, an external and independent provider, contracted by MUFG Pension & Market Services to receive Disclosures impartially and confidentially. When an anonymous or partially anonymous Disclosure is made to FairCall, the identifying information of the Whistleblower will not be provided to MUFG Pension & Market Services.

You can contact FairCall by:

Telephone:	1 800 500 965 (within Australia) 0 800 100 526 (within New Zealand) 0808 234 7091 (within UK) 1800 200 625 (within Ireland) 0008 0004 022 32 (within India) +61 2 9335 8785 (all other countries)
Online	www.kpmgfaircall.kpmg.com.au/MUFGPensionandMarket
Mail	The FairCall Manager KPMG Forensic PO Box H67 Australia Square Sydney NSW 1213 Australia

4.2.3 ALTERNATIVE DISCLOSURE CHANNELS - EXTERNAL

You may also make a Disclosure or report a breach of your protections as a Whistleblower to an external party listed below and still qualify for protections, in accordance with your jurisdictional laws or regulations:

- Regulators or other bodies such as Australian Securities & Investments Commission, Australian Prudential Regulation Authority, UK's Financial Conduct Authority, Central Bank of Ireland, New Zealand Police, Serious Fraud Office (New Zealand).
- A legal practitioner for the purposes of obtaining legal advice or legal representation.
- A Member of Parliament or a journalist for a Public Interest Disclosure or an Emergency Disclosure. Whistleblowers are encouraged to contact a WPO or FairCall or an independent legal adviser prior to making a Public Interest Disclosure or an Emergency Disclosure to understand the criteria for making such Disclosure and qualifying for protections.

Important:

Disclosures relating to conduct of MUFG Pension & Market Services can also be made by clients, suppliers or other third parties, in which case they will be managed the same way in accordance with this Policy and the Whistleblower Procedure.

On the other hand, MUFG Pension & Market Services may also receive Disclosures relating to conduct of a third party (e. g. client or supplier) that has an impact on MUFG Pension & Market Services. In this case, the third party may need to be engaged for the investigation, and their Whistleblower Policy should be consulted.

4.3 How will a Disclosure of Reportable Conduct be handled¹?

After a Disclosure is received internally or by FairCall:

- The Disclosure will be confidentially referred to a designated MUFG Pension & Market Services WPO for assessment of whether:
 - a) it is a Disclosure of Reportable Conduct - note disclosures that are not about Reportable Conduct, may be referred to other appropriate channels as set out in the *Speak Up* intranet page, and may not qualify for protection in some of the jurisdictions where MUFG Pension & Market Services operates; and
 - b) a formal investigation is required.

¹ Where a Disclosure arises in relation to Indian operations that are regulated by SEBI and involves Key Management Personnel (KMP) in India, enhanced independence standards apply.

A WPO will receive, safeguard and coordinate disclosures, however Disclosures involving KMP of a SEBI-regulated entity shall be overseen by the entity's Audit Committee (or another independent board committee). Oversight shall be exercised only by independent, non-conflicted members. To ensure integrity and confidentiality, the WPO must engage the entity's Audit Committee or a local WIO to ensure confidential management of both the process and record keeping. The entity's Audit Committee and WIO must ensure the conflicted member is not 'tipped off' to the existence or nature of the disclosure.

The entity's Audit Committee (or another independent board committee) shall determine investigation, remediation and any regulatory escalation. Management, including the KMP, must not participate in or influence those decisions where they are the subject of, or materially connected to, the Disclosure.

KMP includes senior management, a director or the founder of a business in India regulated by SEBI.

- If a formal investigation is required, the WPO, in consultation with a senior member in the ERM team (Head of or above), will appoint an appropriate **Whistleblower Investigation Officer (WIO)** to investigate the matter. Investigation needs to be made within a reasonable timeframe. A WIO can be:
 - i. an executive in MUFG Pension & Market Services, a division, or a business entity,
 - ii. a senior member in Risk and Compliance, HR, Legal, ERM or the audit team or external investigator.

It is important that the appointed WIO conducts a fair, impartial and thorough investigation of the matter without bias, as such there should be no material conflicts of interest between the WIO and the subject of the Disclosure of Reportable Conduct, and the WIO needs to have appropriate level of authority and experience to conduct the investigation.

- The WIO is responsible for conducting the investigation within a reasonable timeframe, with the support of internal and/or external resources (e.g. for sophisticated investigations) as appropriate. Investigations will be independent of the Whistleblower and any person who is the subject of the Disclosure and will ensure fair treatment of all parties.
- All Disclosures of Reportable Conduct are to be treated as being submitted on a confidential basis. The WPO and the WIO must always keep the details of the Whistleblower and their Disclosure confidential. The Whistleblower's identity will be protected, unless the Disclosure is subject to regulatory or legislative requirements, or the disclosure is necessary to remove or lessen a threat to life.
- Where a Whistleblower makes a Disclosure anonymously, both the WPO and the WIO must respect that anonymity. They must not attempt to identify, or speculate about the identity of, the Whistleblower based on the information available to them.
- The Whistleblower, where they have not reported anonymously, will be informed of the WIO appointment and the WIO will:
 - contact the Whistleblower as soon as practicable to acknowledge receipt of the Disclosure and to establish a process, including expected timeframes, for informing the Whistleblower on the progress of dealing with the Disclosure.
 - inform the Whistleblower at the earliest possible opportunity if it is determined that there is insufficient information or evidence to warrant further investigation.
 - inform the Whistleblower of the outcome of the investigation, subject to the considerations of the privacy of the subject of the Disclosure and confidentiality requirements. To protect the confidentiality of the investigation (due to its potential impact on other employees), a full detailed account of the investigation conclusion may not in some cases be provided.
- Where a Whistleblower makes an anonymous Disclosure to FairCall, they will receive a unique reference number, which can be used to contact FairCall to provide further information or request an update.
- Where investigations substantiate an allegation arising from the Disclosure of Reportable Conduct, the matter will be dealt with in accordance with established administrative or disciplinary procedures, which may result in disciplinary action, including termination of employment or engagement.
- The WIO needs to keep an audit trail of investigation activities and findings, supported by logical reasoning. The information is then maintained confidentially by the ERM team for centralised record keeping and reporting purposes. If an ERM team member is the subject of a Disclosure, the WPO will determine the appropriate record keeping and reporting venue.
- On a quarterly basis, ERM will report whistleblowing Disclosures to the Board Risk and Compliance Committee (BRCC) including whether an investigation is required, the progress of the investigation, the investigative conclusion, and any remedial actions required. For Disclosures that may significantly impact MUFG Pension & Market Services and/or its client(s), ERM may provide more regular reporting as appropriate. Additionally on an annual basis ERM will report to BRCC on the operation and effectiveness of the Policy.

- All records relating to a Disclosure of Reportable Conduct are to be retained in secure storage in accordance with local legislative and regulatory requirements, as outlined in any relevant record retention schedules, and in accordance with the *MUFG Pension & Market Services Data Retention Policy*.

4.4 Training and access to this Policy

On an annual basis, all MUFG Pension & Market Services directors, employees and contractors are required to undergo *MUFG Pension & Market Services' Code of Conduct & Ethics* training that includes a module on whistleblowing. There may be additional whistleblowing training for certain roles.

This Policy is available on the MUFG Pension & Market Services public website, intranet, and on request from any member of the divisional Risk and Compliance teams or the ERM team.

5. ROLES AND RESPONSIBILITIES

Roles	Responsibilities
All directors, employees and contractors of MUFG Pension & Market Services and its subsidiaries	All directors, employees and contractors of MUFG Pension & Market Services and its subsidiaries, who make a Disclosure of Reportable Conduct, must do so in accordance with this Policy. When making a Disclosure of Reportable Conduct, the Whistleblower is responsible for: • acting honestly, without bias or any ulterior motive, and based on Reasonable Grounds for suspecting or believing a Reportable Conduct has occurred. • reporting all facts they have knowledge of the Reportable Conduct and providing any evidence they possess. • making the Disclosure via a permissible channel set out in section 4.2 'How to make a Disclosure of Reportable Conduct' of this Policy. • Investigations will be conducted independent of the Whistleblower and any person who is the subject of the Disclosure. All other directors, employees and contractors must assist the investigation when required.
Enterprise Risk Management within Line 2 Risk & Compliance (ERM)	Key responsibilities include: • owning the Policy and the underlying process that applies to the entire Group. • assisting a WPO in appointing a WIO, when required. • maintaining secure central record of all Disclosures, their investigation outcomes and any remedial actions. • reporting the Disclosures received and the effectiveness of the Policy to the BRCC.
Whistleblowing Investigation Officer (WIO)	Key responsibilities include: • conducting investigations into Disclosures of Reportable Conduct in an objective, fair, independent, thorough, timely, and confidential manner, which may include the use of internal and/or external investigative resources. • when a Whistleblower has not made a Disclosure anonymously, keeping them informed of the investigation's progress, while maintaining the privacy of the subject of the Disclosure and confidentiality requirements. • keeping an audit trail of investigation activities and findings, supported by logical reasoning, which is then shared with the ERM team for central record keeping and quarterly reporting purposes.

Roles	Responsibilities
Whistleblowing Protection Officer (WPO)	Key responsibilities include: - receiving and assessing Disclosures from whistleblowing channels to determine whether further investigation is required; - protecting and supporting Whistleblowers from retribution or other detriment that may arise as a result of disclosing Reportable Conduct; - appointing an appropriate WIO who should lead the investigation, with input from ERM, unless an ERM member is the subject of the Disclosure; - overseeing the investigation process and any subsequent actions required to resolve the issue, and ensuring the integrity, independence and effectiveness of the processes in accordance with this Policy.
Key Management Personnel (KMP)	Senior management, a director or the founder of a business in India regulated by SEBI.
MUFG Pension & Market Services Holdings Ltd Board	- Receive reporting on permitted details of any Disclosures of Reportable Conduct, - Receive a report on the annual operation and effectiveness of the Policy.
SEBI regulated entity audit committee or board committee	Receive and oversee Disclosures of Reportable Conduct that involves KMP. Oversight shall be exercised by independent, non-conflicted members only.
Line 3 Group Internal Audit	Provides independent assurance over the effectiveness of MUFG Pension & Market Services' governance, risk and compliance management and Control practices.

6. POLICY MONITORING AND REPORTING

The ERM team (except where a Disclosure of Reportable Conduct relates to them in which case the Chair of the BRCC) must report to the BRCC:

- quarterly on the Disclosures of Reportable Conduct received over the reporting period; and
- annually on the operation and effectiveness of the Policy.

The reports shall maintain the confidentiality of individual Whistleblowers.

The WPO, or their delegate, must also report promptly to any regulators where the regulator's rules or regulations require this, for example in contested employment claims where a claimant successfully based all or part of their claim on a Disclosure, or if a Breach requires reporting to a regulator. Refer to the Regulatory Interaction Policy and Breach Management Standard for further details.

If a person who makes a Disclosure of Reportable Conduct considers that their Disclosure has not been dealt with in accordance with this Policy, or that they have been subject to retribution or other detriment because of the Disclosure, the matter should be escalated to the WPO in the first instance or otherwise to the Chair of BRCC. The WPO, in consultation with the Chair of BRCC, will determine the most appropriate course for handling the matter, which may include informal resolution options or a formal investigation.

Any matters of a criminal nature will be reported by the WPO, in consultation with the Chair of the BRCC, to the police and, if appropriate, other appropriate regulatory authorities.

7. NON-COMPLIANCE

Non-compliance with the Policy will be dealt with in accordance with established administrative or disciplinary procedures which may result in disciplinary action, including termination of employment or engagement. Such persons may also face civil or criminal actions.

MUFG Pension & Market Services Persons who cause, or threaten to cause, detriment to a Whistleblower, or who directly or indirectly cause the identity of a Whistleblower to be made known, may be subject to disciplinary action up to and including termination of employment or engagement. Such persons may also be found to be civilly or criminally liable.

8. RELATED DOCUMENTS AND SOURCES

Please ensure you are familiar with the following MUFG Pension & Market Services documentations:

- *MUFG Pension & Market Services Code of Conduct & Ethics*
- *MUFG Pension & Market Services Anti-Bribery and Anti-Corruption Policy*
- *MUFG Pension & Market Services Data Retention Policy*
- *MUFG Pension & Market Services Grievance Policy*
- *MUFG Pension & Market Services AML/CTF, Sanctions & Fraud Prevention Policy*
- *MUFG Pension & Market Services Conflicts of Interest Policy*
- *MUFG Pension & Market Services Risk Events Management Policy*
- *MUFG Pension & Market Services Regulator Interaction Policy*
- *MUFG Pension & Market Services Breach Management Standard*
- *MUFG Pension & Market Services Whistleblower Procedure*
- *MUFG Pension & Market Services Speak Up* Intranet page
- *MUFG Pension & Market Services Disciplinary Policy*

Related external sources include:

Australia

- Corporations Act 2001 (Cth) (Corporations Act)
- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019
- Tax Administration Act 1953 (Cth)
- ASIC Regulatory Guide 270 *Whistleblower policies*
- Fair Work Act 2009

India

- Securities and Exchange Board of India -RTA Regulations and Circular
- Indian Companies Act 2013 and Companies Rules

New Zealand

- Protected Disclosures (Protection of Whistleblowers) Act 2022
- Employment Relations Act 2000
- Human Rights Act 1993

UK

- Public Interest Disclosure Act 1998 (UK)
- Employment Rights Act 1996
- FCA Handbook

9. DEFINITIONS

Term	Definition
Breach	A deviation from an applicable Compliance Obligation of MUFG Pension & Market Services, including applicable law, regulation, enforceable guidance or enforceable code (i.e. a Compliance Obligation has not been met).
Disclosure	The deliberate and voluntary disclosure or attempted disclosure of information that alleges the existence of Reportable Conduct.
Emergency Disclosure	In Australia, an Emergency Disclosure is the Disclosure of information to a journalist or parliamentarian, where: - the Whistleblower has previously made a disclosure of the information to the Australian Securities & Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA), or another prescribed Commonwealth body, - the Whistleblower acts on Reasonable Grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment, - before making the Emergency Disclosure, the Whistleblower has given written notice to the body to which the previous Disclosure was made that: - includes sufficient information to identify the previous Disclosure; and - states that the Whistleblower intends to make an Emergency Disclosure, or - the extent of the information disclosed in the Emergency Disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.
MUFG Pension & Market Services	MUFG Pension & Market Services Holdings Pty Limited and all of its subsidiaries.
MUFG Pension & Market Services Person	Current and former directors, officers, employees, contractors, consultants, suppliers, third party providers, secondees and advisers of MUFG Pension & Market Services, and includes relatives and dependents of any of those persons.
Public Interest Disclosure	In Australia, a “Public Interest Disclosure” is the disclosure of information to a journalist or parliamentarian, where: - at least 90 days have passed since the Whistleblower made the Disclosure to the ASIC, APRA, or another Commonwealth body prescribed by regulation. - the Whistleblower does not have Reasonable Grounds to believe that action is being, or has been taken, in relation to their Disclosure; - the Whistleblower has Reasonable Grounds to believe that making a further disclosure of the information is in the public interest; and - before making the Public Interest Disclosure, the Whistleblower has given written notice to the body to which the previous Disclosure was made that: - includes sufficient information to identify the previous Disclosure; and - states that the discloser intends to make a Public Interest Disclosure.
Reasonable Grounds	Reasonable Grounds means that a reasonable person in your position, would also suspect the information indicates misconduct or a breach of the law. In New Zealand, this extends to include acting in good faith when making a Disclosure.
Reportable Conduct	Actual or suspected illegal, unacceptable, undesirable conduct, or serious wrongdoing. This may include conduct or behaviour (actual or attempted) that is: - dishonest; - unethical; - fraudulent;

Term	Definition
	• corrupt; • illegal (such as theft, misappropriation of funds, bribery, undue influence, false and misleading statements in the course of business, use and/or sale of illicit substances, violence or threatened violence in the course of business, breach of a legal or regulatory obligation of MUFG Pension & Market Services such as a breach of Corporations Act); • non-compliant with, or may give rise to questionable accounting or auditing practices; • a serious risk to public health, public safety, including a serious risk to the environment; • breach of the <i>MUFG Pension & Market Services Code of Conduct and Ethics</i> such as deliberate contravention of a MUFG Pension & Market Services policy; or • any deliberate concealment relating to any of the above. Reportable Conduct can include the conduct of a MUFG Pension & Market Services Person or a third party such as a supplier or service provider. Where a jurisdiction's equivalent requirements of Reportable Conduct extend beyond the basic definition in this Policy (including for example in the UK, where a Disclosure is required to be in the public interest), it is the intention of this Policy that the protections it affords cover any and all such extended requirements. Examples include: • UK – Disclosure is required to be in the public interest. • New Zealand – the definition extends to both ○ an unsafe and unhealthy work situation, and ○ serious privacy wrongdoings, such as a systemic misuse of personal information or a failure to protect personal data under privacy legislation.
Whistleblower	A person who Discloses (or attempts to Disclose) Reportable Conduct.
Whistleblowing Investigations Officer (WIO)	A WIO is the person who has been appointed to investigate into the Disclosure of Reportable Conduct.
Whistleblowing Protection Officer (WPO)	A WPO is the person who has been appointed within MUFG Pension & Market Services to be responsible for protecting or safeguarding Whistleblowers and ensuring the integrity of the reporting mechanism.

10. DOCUMENT CHANGE HISTORY

Purpose/Change	Author	Approved by	Date
Routine Review		Board	January 2020
Routine Review		Board	March 2021
Routine Review		Board	February 2022
Routine Review		Board	March 2023
- Consolidating content from the MUFG Pension & Market Services Whistleblower Protection Policy in this Policy, including protections available to Whistleblowers. - Proposed new Whistleblower Protection Officers. - More details on how a Disclosure of Reportable Conduct is assessed and investigated. - Adding a requirement for ERM to assist the WPO to nominate WIO, centrally maintain all records of whistleblowing Disclosures and provide regular reports to the BRCC on the whistleblowing cases and the effectiveness of the Policy. - Updated governing bodies to align with the MUFG Pension & Market Services Delegation of Authority Policy, and updated roles and responsibilities to align with the current operating model. - Rebranded conforming to MUFG Pension & Market Services branding.	Stephanie Shrinet, Head of Framework, Policy & Group Compliance	Executive Risk & Compliance Committee	August 2024
Document links updated following intranet migration	Stephanie Shrinet, Head of Framework, Policy & Group Compliance	n/a	December 2025
- Refreshed Whistleblower Protection Officer listings - Strengthened confidentiality requirements - Incorporation of additional legislative requirements for our Indian entities	Stephanie Shrinet, Head of Framework, Policy & Group Compliance	ERCC	August 2026