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1 Subject matter, objective, and purpose

The purpose of this policy is to encourage reporting of suspected unethical, illegal, fraudulent or undesirable conduct and to deter such conduct. In addition, it aims to promote Bosch's values of 'openness and trust' and 'reliability, credibility, legality'.

The policy sets out measures to ensure individuals who disclose conduct covered by the policy can do so safely, confidentially and with support and protection.

2 Scope

This policy shall apply to the following proprietary Bosch organisations in Australia:

Robert Bosch (Australia) Pty Ltd

Bosch Automotive Service Solutions Pty Ltd

Bosch Rexroth Pty Ltd

Bosch Security Systems Pty Ltd

SIA Abrasives (Australia) Pty Ltd

Any reference to Bosch throughout this policy relates to the above proprietary entities.

Within those organisations this policy applies to:

- any company officer or employee of Bosch (including current and former employees , irrespective of tenure);
- suppliers of services or goods to Bosch (including current and former contractors consultants, service providers and business partners);
- an associate of Bosch; or
- a relative dependant or spouse of the above.

3 Raising concerns at Bosch

Bosch is committed to a supportive and compliant workplace. We encourage you to raise concerns about conduct at Bosch or relating to Bosch.

Bosch provides a Compliance Hotline to report issues which is supported by this policy

4 Disclosable Conduct

A report can be made under this policy if you have reasonable grounds to suspect that a person has engaged in conduct that includes:

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- illegal conduct e.g. theft, dealing in or use of drugs, threatened or actual violence, harassment, criminal damage to property;
- fraud, money laundering, bribery, misappropriation of funds or activity set out in Bosch’s Code of Business Conduct and other compliance policies and procedures;
- misconduct such as negligence, breach of trust or breach of duty including altering company records, financial irregularities and questionable accounting practices;
- failure to comply with, or breach of, legal or regulatory requirements;
- activities that may be damaging to Bosch, a Bosch employee or third party e.g. unsafe work practices, cause risks to health, safety or the environment;
- unauthorised use of Bosch confidential information;
- conduct causing financial or non-financial detriment to Bosch;
- other misconduct or improper state of affairs.

(Disclosable Conduct)

Reports relating to conduct that is **not** Disclosable Conduct **are not protected by this policy or under the Corporations Act.**

Protection is generally **not available** under this policy if you report solely personal work-related grievances e.g. decisions relating to a transfer or promotion, decisions relating to the terms and conditions of your employment or disciplinary action etc.

However, there are some limited circumstances when personal work related grievances may be covered by this policy and include:

- it concerns detriment to you because you have or may be considering making a disclosure;
- the disclosure is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about whistleblowers.

Under the law, a grievance is not a ‘personal work related grievance’ if it:

- has significant implications for an entity regulated under the law (e.g. Bosch) that do not relate to you;
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or is an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;
- concerns conduct that represents a danger to the public or financial system;
- concerns conduct prescribed by the regulations.

Bosch encourages all employees to report any work related grievances not covered by this policy to their supervisor or HR representative.

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5 False or misleading disclosures

When reporting Disclosable Conduct, you must have reasonable grounds to believe the information being disclosed is true. You must not make a report that you know is false or misleading.

If on investigation, the information you believed to be true, turns out to be incorrect, you will not be penalised.

If it is found that you knowingly disclosed false or misleading information, this may result in disciplinary action and/or legal consequences.

6 Making a protected disclosure to Bosch

Disclosable Conduct must be reported to any of the following people within Bosch or through the Bosch Compliance Hotline in order for you to receive protection under this policy:

- RBAU/P – Regional President
- GS/FC-AU – Vice President Finance and Controlling
- C-LSR/AU – Legal Counsel
- C/CMR-AU - Regional Compliance Officer
- C/AUP2-AU – Protection and Security Officer Australia

The Bosch Compliance Hotline can be located at: <https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=18RB2&language=eng>

A disclosure may be made at any time including outside of business hours.

7 Making a protected disclosure outside of Bosch

If you do not wish to report Disclosable Conduct to any of the above listed people in Bosch or via the Bosch Compliance Hotline, you can make a report to the following external entities to receive protection:

- ASIC – Australian Securities and Investments Commission
- ATO – Australian Tax Office
- APRA – Australian Prudential Regulation Authority

Disclosable Conduct reported to a legal practitioner for the purposes of seeking legal advice or representation about whistleblowers provisions in the Corporations Act is protected.

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You may also report Disclosable Conduct that relates to “emergency” and “public interest” situations to journalists and members of the Commonwealth, state or territory parliaments. Please contact C/LSR-AU if you would like more information about these situations.

8 Protection in reporting Disclosable Conduct

If you report Disclosable Conduct, you are protected by law in the following ways:

- you will not be subject to civil, criminal or administrative liability;
- no contractual or other remedy can be enforced against you because of the disclosure;
- in some circumstances (e.g. if the Disclosable Conduct has been reported to a regulator), the information disclosed is not admissible in evidence against you in criminal proceedings or in proceedings to impose a penalty, other than if the proceedings relate to false information being disclosed; and
- there is compensation and remedies available to you if you suffer loss, damage or injury because of a disclosure.

9 Making an anonymous disclosure

You may report Disclosable Conduct anonymously if you do not want to reveal your identity. The Bosch Compliance Hotline allows for anonymity through use of a username and password.

Providing your name when reporting possible Disclosable Conduct will assist Bosch in conducting its investigations, however you are not required to do so.

If you do not provide your name, Bosch will investigate the Disclosable Conduct to the best of its ability, and as far as possible, in the same way as if you had provided these details. However, if insufficient details are provided in your reporting, Bosch may not be able to thoroughly investigate the matter.

Any information received from you in reporting Disclosable Conduct will be held and treated with the strictest of confidence. Your identity will be protected as set out below.

10 Investigations of reported Disclosable Conduct

Any report of Disclosable Conduct made to Bosch will be treated seriously and dealt with objectively.

Bosch does not guarantee that the reporting of Disclosable Conduct will be formally investigated. Each report will be assessed and considered by Bosch and a decision made on its merit. If sufficient information is not reported, Bosch may determine an investigation is not possible.

Any reports made to Bosch will be dealt with in a timely manner. Investigations will generally be managed and overseen by the RBAU Compliance Officer. However, others listed under section 6

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within Bosch may be asked to assist where necessary to ensure the report of Disclosable Conduct is dealt with efficiently and fairly.

Bosch employees and contractors are required to fully cooperate with any investigations of Disclosable Conduct.

Any person who is the subject of a disclosure will be informed of the nature of the allegation at an appropriate point in time, and in circumstances where it will not compromise the effectiveness of an investigation and application of natural justice.

Where Bosch engage a third party organisation to support an investigation, this will be done subject to a documented contract that will oblige the third party to adhere to the Bosch code of conduct and internal investigation protocols.

11 After reporting Disclosable Conduct

When a report of Disclosable Conduct is made to Bosch and an investigation occurs, the results of the investigation will be recorded in writing and reported to the Bosch Regional Compliance Officer or the Regional Compliance Officer proxy. This written report will be the property of Bosch. At no time will the written report be provided to you as the discloser making the report of Disclosable Conduct or to anyone subject to an investigation.

Whilst you will not receive a copy of the written report, you will generally be advised of the outcome of the investigation unless it is inappropriate for Bosch to share the information.

If the investigations uncovers a breach of law, Bosch's Code of Business Conduct or other Bosch policies and procedures, appropriate disciplinary action may be taken which could include termination or suspension of employment or engagement of the person/s involved in the Disclosable Conduct.

12 Protection for whistleblowers

Bosch encourages you to report Disclosable Conduct and is committed to protecting and respecting your rights under this policy.

Bosch will protect you under this policy by safeguarding your identity as a whistleblower and protecting you from detriment in reporting Disclosable Conduct.

In reporting any Disclosable Conduct, Bosch will only disclose your identity if:

- you provide consent to Bosch to do this;
- the disclosure is allowed or required by law;
- it is necessary for an investigation (all reasonable steps will be taken to prevent someone from working out your identity).

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Bosch will not allow or support any detrimental conduct towards you if you report Disclosable Conduct, or detrimental conduct towards any of your colleagues, family or employer, if you are a contractor.

Detrimental conduct includes the following action or threat of this action:

- discrimination, harassment, intimidation or retaliations; or
- damage to reputation; or
- demotion or dismissal.

If you are, have been or may be subject to any detrimental conduct, you should report this immediately to the Bosch Regional Compliance Officer. Bosch may refer a person who has been involved in detrimental conduct to law enforcement authorities for investigation.

Any person involved in detrimental conduct may be subject to disciplinary action which may include termination of employment or engagement and may constitute a criminal offence punishable by imprisonment.

Bosch may offer you further protection at its discretion and subject to the particular circumstances and information available:

1. relocating you or the employee/s who are alleged to be involved in Disclosable Conduct or detrimental conduct;
2. offering you leave of absence or working remotely (if appropriate) whilst the matter is being investigated;
3. rectifying any detriment you have suffered where possible and appropriate.

Bosch encourages you to access the Employee Assistance Program (EAP), which can be contacted on:

Converge International

1300 687 327 (Australia)
0800 666 367 (New Zealand)
+613 8620 5300 (International)
eap@convergeintl.com.au

13 Record keeping

All information including documents, records, reports etc. that relate to the investigation of reported Disclosable Conduct will be treated as confidential, stored and retained in a secure and appropriate location.

This information can only be accessed by RBAU Compliance Officer, the RBAU Compliance Officer Proxy and the Bosch Global Compliance function.

It is accessed by these people to assist Bosch to determine an appropriate response to the report and for the purposes of investigating the matter efficiently.

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14 Reporting under this policy

On a monthly basis, the Bosch Global Compliance function will be provided with a summary of Disclosable Conduct reported under this policy. This summary will not identify you or other people who have made disclosures.

The summary will include information such as the types of issues raised, number of reports, dates etc.

This Whistleblower policy will be reviewed every two years and must address the effectiveness of the policy. In particular, the review must consider the fairness of investigations carried out, consequences for disclosers and compliance with the policy.

The review and any proposed changes to the policy must be approved by the Bosch Regional Compliance Officer and the RBAU Regional President.

15 Relationship to other Bosch policies and procedures

This policy should be read and used in conjunction with the following Bosch policies and procedures:

1. Bosch Code of Business Conduct;
2. Oceania Code of Conduct;
3. Bosch Compliance App;
4. Compliance Training – web based and face to face;
5. Compliance Dialogue: FAQ.

16 Stakeholder Approval

Electronic Approval: WorkON RBGA – RBGA-3499103				
Stakeholder RBAU/P Gavin Smith	Stakeholder C/CMR-AU Mike Hagan			
Date: 13/1/2020	Date: 13/1/2020			
Signature: G. Smith	Signature: M. Hagan			



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Revision History

Issue	Date	Editor	Description of amendment
1	1/1/2020		Initial release