

# Wells Fargo International Finance (Australia) Pty Ltd - Whistleblower Policy

Supplemental to the Corporate Wells Fargo Speak up and Non-retaliation Policy\*

## 1. Purpose

The purpose of this policy is to set out the approach for eligible whistleblowers (as defined in section 2) who seek to raise concerns, disclose information and/or challenge unethical behaviour to be able to do so without fear of retaliation. Eligible whistleblowers are encouraged to report any concerns of perceived misconduct or wrongdoing on the part of any Wells Fargo group, company or employee:

- on a safe, secure and confidential basis;
- in the knowledge that their report will be researched by Wells Fargo without any detrimental action being taken against them for having made such a report/disclosure.

It also provide transparency around Wells Fargo International Finance (Australia) Pty Ltd's framework for receiving, handling and investigating disclosures and establishes the expectation and requirement of Wells Fargo not to retaliate against the whistleblower who engages in a disclosure of disclosable matters.

## 2. Areas Primarily Affected

This policy applies to disclosers that qualify as an **eligible whistleblower** (as defined in section 3) in relation to Wells Fargo International Finance (Australia) Pty Ltd ("Wells Fargo") and:

- (a) they have made a disclosure of information relating to a '**disclosable matter**' (as defined in section 4) directly to an '**eligible recipient**' (as defined in section 5) or to a competent regulator such as ASIC or another Commonwealth body prescribed by regulation;
- (b) they have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act; or
- (c) they have made an 'emergency disclosure' or 'public interest disclosure'.

Such discloser qualifies for protection as a whistleblower under the Corporations Act (refer to section 9 below on protections for disclosers). Disclosures that are not about disclosable matters do not qualify for protection under the Corporations Act or the Taxation Administration Act.

**Tax Whistleblowers:** To qualify for protection under the tax whistleblower regime, the eligible whistleblower must have reasonable grounds to suspect that the information indicates misconduct or an improper state of affairs or circumstances in relation to tax affairs of the entity. The eligible whistleblower may assist the eligible recipient to perform its functions or duties in relation to those tax affairs.

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To disclose a tax issue, a discloser can contact the Australian Taxation Office (ATO) in the following manner:

- complete the tip-off form in the contact section of the ATO app
- phone 1800 060 062
- Report unpaid super contributions from your employer (but not about another business)
- write to the ATO – mark all letters 'in confidence' and mail to:

Australian Taxation Office  
Tax Integrity Centre  
Locked Bag 6050  
DANDENONG VIC 3175

- to speak to the ATO in a language other than English, phone the Translating and Interpreting Service (TIS) on 13 14 50 for help
- tax practitioners – phone the ATO on 13 72 86 (Fast Key Code 3 4).

### **3. Eligible Whistleblower**

The following individuals may raise a “disclosable matter” (defined in section 4 below) and be classed as an “eligible whistleblower”:

1. an officer or employee (e.g. current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers, and directors) of Wells Fargo;
2. a supplier of services or goods to the entity (whether paid or unpaid), including their employees (e.g. current and former contractor resources, external consultants, contingent resources, service providers and business partners);
3. an associate of the entity (such as a director or a secretary of a related entity of Wells Fargo); and
4. a relative, dependant or spouse of an individual listed above.

### **4. Disclosable Matters**

Disclosable matters involve information that the discloser has reasonable grounds to suspect concerns of misconduct (including fraud, negligence, default, breach of trust, breach of duty) or an improper state of affairs or circumstances in relation to Wells Fargo International Finance (Australia) Pty Ltd.

Note: Reporting a disclosable matter is deemed a Protected Activity under the Wells Fargo Speak Up and Non-retaliation Policy.

Examples of a disclosable matter include, but are not limited to:

- fraud, money laundering or misappropriation of funds;
- corrupt behavior (including bribery and acting dishonestly);
- unethical behavior such as breaching Wells Fargo policy or code of conduct;

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- financial irregularity;
- workplace health or safety breaches;
- mismanagement of Wells Fargo resources;
- concealing a disclosable matter;
- failure to comply with, or breach of, legal or regulatory requirements; and
- business behaviour and practices that may cause consumer harm.

Disclosable matters include conduct that may not involve a contravention of a particular law. Information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a disclosable matter, even if it does not involve a breach of a particular law. A discloser can still qualify for protection even if their disclosure turns out to be incorrect.

Not all matters are considered a disclosable matter and are afforded protection under this policy. Personal Work-Related Grievances are not considered a disclosable matter under this policy.

A personal work-related grievance is a matter that has one or more of the following characteristics:

1. an interpersonal conflict between the discloser and another employee;
2. a decision that does not involve a breach of workplace laws;
3. a decision about the engagement, transfer or promotion of the discloser;
4. a decision about the terms and conditions of engagement of the discloser; or
5. a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

To raise any personal work-related grievance please contact the following:

1. Your manager;
2. Your manager's manager or local HR Representative; or
3. Employee Relations via the e-Form: ( [http://hop.wellsfargo.com/tmhb\\_ereform](http://hop.wellsfargo.com/tmhb_ereform) ) ([requires sign on for access](#))

Please refer to the grievance procedure in the Team Member Handbook for Australia. Please note that the grievance procedure does not preclude employees from matters concerning workplace laws to prescribed external authorities, such as the Fair Work Ombudsman or Fair Work Australia.

A personal work-related grievance may still qualify for protections discussed in section 9 if:

- (a) it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- (b) Wells Fargo has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- (c) the discloser suffers from or is threatened with detriment for making a disclosure; or

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- (d) the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

## 5. Eligible Recipients - Who can receive a disclosure?

A discloser needs to make a disclosure directly to one of the eligible recipients to be able to qualify for protection as a whistleblower. The role of an eligible recipient is to receive disclosures that qualify for protection.

An eligible recipient includes:

- (a) an officer or senior manager of Wells Fargo or related body corporate. Generally, an 'officer' includes a director or company secretary of Wells Fargo. A 'senior manager' is generally a senior executive within Wells Fargo, other than a director or company secretary, who: (a) makes or participates in making decisions that affect the whole, or a substantial part, of the business of the entity; or (b) has the capacity to significantly affect Wells Fargo's financial standing;
- (b) the internal or external auditor (including a member of an audit team conducting an audit) or actuary of Wells Fargo or related body corporate; and
- (c) a person authorised by Wells Fargo to receive disclosures that may qualify for protection. Persons authorised by Wells Fargo to receive disclosures are set out in section 6, including a discloser's manager or another manager with whom the discloser feels comfortable, Human Resources team, and the Board of Directors and Senior Leadership/Management Employees.

## 6. Raising a Disclosable Matter

There are various ways in which a discloser can raise a disclosable matter without fear of retaliation. Disclosers may report their concerns through the following options:

- The disclosers' manager or another manager with whom the discloser feels comfortable. If the discloser reports the concern to a manager, that manager must report it as soon as possible to Human Resources, or the EthicsLine;
- Human Resources team – where applicable, follow the grievance resolutions or reporting procedure at the disclosers' work location or if there is no specific grievance resolution or reporting procedure, report to the appropriate Human Resources professional;
- [EthicsLine](#) available 24 hours a day, seven days a week and is staffed by third-party communication specialists. Information is collected and passed to Wells Fargo for research and/or investigation. The EthicsLine provides disclosers with a confidential way to report concerns and disclosers can remain anonymous to the extent allowed by applicable law; or
  - Telstra 1-800-881-011
  - Optus 1-800-551-155
- Board of Directors and Senior Leadership/Management Employees are eligible to receive a disclosure.

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Disclosures can be made anonymously and still entitled to protections as described in section 9. A discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A discloser can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. A discloser who wishes to remain anonymous should maintain ongoing two-way communication with Wells Fargo, so that Wells Fargo can ask follow-up questions or provide feedback.

In some cases disclosers may feel they cannot raise concerns internally, in these cases they can use external reporting channel, EthicsLine. Disclosers can also make a disclosure to regulatory bodies or authorities. This includes the Australian Securities and Investment Commission (ASIC), Australian Prudential Regulator Authority (APRA) and the Australian Taxation Office (ATO).

### **Disclosures to Legal practitioners**

Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower regime in Australia are protected (even in the event that the legal practitioner concludes that a disclosure does not relate to a 'disclosable matter').

A discloser may obtain additional information before formally making their disclosures by contacting one of the options where a discloser may report their concerns.

### **Public interest disclosures and emergency disclosures**

The law also protects certain disclosures made in "emergency" and "public interest" situations, in which case disclosures can be made to a journalist or parliamentarian. It is important to understand the criteria for making a public interest or emergency disclosure.

A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:

- (a) at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- (b) the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
- (c) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- (d) before making the public interest disclosure, the discloser has given written notice to ASIC, APRA or another Commonwealth body (i.e. the body to which the previous disclosure was made) that: (i) includes sufficient information to identify the previous disclosure; and (ii) states that the discloser intends to make a public interest disclosure.

An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:

- (a) the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- (b) the discloser has 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;
- (c) before making the emergency disclosure, the discloser has given written notice to ASIC, APRA or another Commonwealth body (i.e. the body to which the previous disclosure was made) that: (i)

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- includes sufficient information to identify the previous disclosure; and (ii) states that the discloser intends to make an emergency disclosure; and
- (d) 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.

## **7. Disclosable Matter Investigations**

All disclosable matters are handled in line with Wells Fargo's Allegation Management Policy. In the event of any conflict or inconsistency between the Allegation Management Policy and this policy, the latter prevails.

The following steps are a summary of the steps involved in an investigation, with more detailed processes outlined in the Allegation Management Policy, which may be varied for the Asia Pacific (APAC) region, or for Australia:

### **Intake**

As per the Allegation Management Policy, the intake teams are responsible for:

- receiving disclosure from a discloser or other intake channel and manually inputting that information into EAP, or ensuring information received systematically is addressed;
- assigning allegation type to disclosures that were systematically entered in EAP; and
- assigning each disclosure to a research group.

In addition, the intake team will assess each disclosure to determine whether:

- (a) it qualifies for protection; and
- (b) a formal, in-depth investigation is required.

The team will also determine whether a disclosure is an allegation as described in the Allegation Decision Matrix-Exhibit.

For disclosures determined not an allegation, intake teams must refer concerns to the appropriate manager or business group for resolution.

For disclosures determined to be allegations, intake teams must input the information received from the discloser, or validate systematic or automated information (from proactive monitoring or other sources) has been accurately entered, and assign an allegation type (for each reported concern determined to be an allegation for each reported party) in the Enterprise Allegation Platform (EAP) within two business days of receiving the information.

Intake teams must route the case to a research group or Enterprise Investigations within three business days after the information has been entered or validated in EAP.

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## Research

As per the Allegation Management Policy, the research groups are responsible for:

- researching disclosures (to the extent possible without conducting interviews) and referring disclosures for investigation or closing case if no investigation is needed;
- establishing procedures, and practices related to researching disclosures and self-assurance for their group, including, at minimum, all requirements of this policy;
- ensuring disclosure information is captured and updated in EAP and properly validated according to this policy;
- ensuring data confidentiality and adherence to appropriate access rights and data usage;
- escalating concerns and issues to conduct risk control leaders;
- submitting function-specific allegation training and procedures to Conduct Risk on an annual basis; and
- consulting with the Legal Department, Employee Relations, and other key stakeholders regarding the research of disclosures.

The research group must assign the case to a researcher in EAP within five business days of it being received from the intake team.

The research group will not, without discloser's consent, disclose information that is likely to lead to the identification of the discloser as part of its investigation process unless:

- (a) the information does not include the discloser's identity;
- (b) the research group removes information relating to the discloser's identity or other information that is likely to lead to the identification of the discloser (e.g. the discloser's name, position title and other identifying details); and
- (c) it is reasonably necessary for investigating the issues raised in the disclosure.

If the research group determines the concern is not an allegation, it must refer the concern to the appropriate manager or business group for resolution, flag that it is not an allegation and close the case record in EAP.

If the assigned research group confirms the concern is an allegation, it must research the allegation and any underlying events and circumstances that led to the allegation. This is then allocated to Conduct Operations to validate. If Conduct Operations determines an investigation is required, it must assign the case to an investigator.

## Investigation

If Enterprise Investigations determines an investigation is necessary, it must investigate the allegation and any underlying events or circumstances that led to the allegation. It must complete the investigation within 60 business days.

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Disclosers must cooperate fully and honestly with any research or investigative process and must not interfere with the integrity of the process.

Enterprise Investigations will not, without the discloser's consent, disclose information that is likely to lead to the identification of the discloser as part of its investigation process unless:

- (a) the information does not include the discloser's identity;
- (b) the research group removes information relating to the discloser's identity or other information that is likely to lead to the identification of the discloser (e.g. the discloser's name, position title and other identifying details); and
- (c) it is reasonably necessary for investigating the issues raised in the disclosure.

Enterprise Investigations may not be able to undertake an investigation if it is not able to contact the discloser (e.g. if a disclosure is made anonymously and the discloser has refused to provide, or has not provided, a means of contacting them). It could still investigate an anonymous disclosure, even if it cannot get in contact with the discloser, if the discloser has provided sufficient information and Enterprise Investigations removes information that is likely to lead to the identification of the discloser

### **Disposition and Case Closure Activities for Allegations**

Once an investigation has been completed, the outcome of the investigation has to be documented in the EAP system with the appropriate outcome of "Substantiated," "Unsubstantiated," or Inconclusive." Relevant actions are required to be taken to address issues as outlined in the Allegation Management Policy.

## **8. Communicating With the Discloser**

Conduct Operations, Employee Relations Research, and investigators are the only people authorized to communicate with the discloser throughout the course of allegation management lifecycle, and must document those communications in EAP.

Status communications will be provided to the discloser when the reported concern is assigned for review; at the start of the investigation and every 30 days until the investigation is complete; and upon case closure. Discloser will also be contacted following case closure to ensure they have not experienced any problems as a result of raising their concern.

More detailed information on the procedures are outlined in the Allegation Management Policy.

## **9. Protections Available for Disclosers**

### **(A) Confidentiality & Anonymity (Identity Protection)**

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When a disclosable matter is raised, the discloser can choose to remain anonymous or provide their details. If the discloser does provide their details, the identity of the discloser or information will be kept confidential, subject to the following exceptions:

- disclosure to ASIC, APRA, or a member of the Australian Federal Police;
- disclosure to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act);
- disclosure to a person or body prescribed by regulations; or
- disclosure with the consent of the discloser.

Eligible recipients, including intake teams, research groups, Conduct Operations, Enterprise Investigations, and subject matter experts consulted during the lifecycle, and well as leadership, must maintain the anonymity (when requested and as permitted by law) and confidentiality of discloser named or involved. Eligible recipients will therefore only share information related to disclosures with regulatory or law enforcement agencies, legal practitioner, when required by law, regulation, court order, or other legal mandate, or with the discloser's consent.

If the disclosable matter was reported anonymously, communication with the discloser must take place if the necessary means are available (for instance, through the EthicsLine report number). Anonymous discloser will be asked to call back in 14 days with their EthicsLine ID provided.

Note: If contacting the EthicsLine anonymously, communication with anonymous discloser will be limited to those with their EthicsLine ID.

It is illegal for a person to identify a discloser or disclose information that is likely to lead to the identification of the discloser outside the above exceptions. A discloser can lodge a complaint with Wells Fargo about a breach of confidentiality by raising a complaint via InMoment. A discloser may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO, for investigation.

## **(B) Protection from detrimental acts or omissions**

Wells Fargo has an obligation to protect a discloser, or any other person, from detriment in relation to a disclosure of disclosable matter.

Detrimental conduct include, but are not limited to:

- a) dismissal of a discloser;
- b) injury of a discloser in his or her employment;
- c) alteration of a discloser's position or duties to his or her disadvantage;
- d) discrimination between a discloser and other employees of the same employer;
- e) harassment or intimidation of a person;
- f) harm or injury to a person, including psychological harm;
- g) damage to a person's property;
- h) damage to a person's reputation;
- i) damage to a person's business or financial position; or
- j) any other damage to a person.

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In addition, a person cannot make a threat to cause detriment to a discloser (or another person) in relation to a disclosure. A threat may be express or implied, or conditional or unconditional. A discloser (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

Any report of alleged detrimental conduct against a discloser, or any other person in relation to a disclosure will be investigated in accordance with the Speak up and Non-retaliation Policy regarding its' Team Members (Employees).

*Wells Fargo has zero tolerance for acts of retaliation against Team Members (Employees) who in good faith report their concerns of misconduct. If, on investigation, it transpires that an employee has been victimised or subjected to retaliatory behaviour because that employee has whistleblown or attempted to whistleblow, then in accordance with this policy, the offending employee may be subject to corrective action as set out in their Team Members' work location handbook, up to and including termination of employment.*

Here are some examples of actions that are not detrimental conduct:

- a) administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
- b) managing a discloser's unsatisfactory work performance, if the action is in line with the entity's performance management framework.

### **(C) Compensation and other remedies**

If a discloser:

- (a) suffers loss, damage or injury because of a disclosure; and
- (b) Wells Fargo failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct,

the discloser can seek compensation and other remedies through the courts. The discloser should also seek independent legal advice.

### **(D) Civil, criminal and administrative liability protection for Eligible whistleblower (Discloser)**

A discloser is protected from any of the following in relation to their disclosure, such as:

- civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure); and
- administrative liability (e.g. disciplinary action for making the disclosure).

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## **(E) Other protections available**

Wells Fargo is committed to ensuring that all disclosers do not suffer detriment because they speak up. The protections offered will be determined by Wells Fargo and depend on things such as the Potential Misconduct and people involved.

Protections will be provided by Wells Fargo as appropriate, and may include the following:

- monitoring and managing the behaviour of employees;
- relocating employees to a different reporting line;
- offering employees (if required) a leave of absence or flexible workplace arrangements while a matter is investigated;
- rectifying and remedying any detriment suffered.

A discloser who is a current or former team member may access Wells Fargo's Employee Assistance Program.

Wells Fargo will look for ways to support all disclosers, but will not be able to provide contingent resources with the same type and level of support that it provides to employees. Other protections available may not apply to contingent resources because Wells Fargo cannot itself offer flexible workplace arrangements to a supplier of services or goods. Wells Fargo will, working with the vendor, endeavor to offer appropriate support as practicable on a cases-by-case basis.

## **(F) Support and practical protection for disclosers**

### **Identity protection (confidentiality)**

Wells Fargo have the following measures and mechanisms in place to protect the confidentiality of a discloser's identity (where applicable):

- all personal or confidential information gathered during the allegation lifecycle will be protected at all time;
- all information will be treated as confidential and access will be limited to team members with a specific business need-to-know, as required to perform allegation management functions or activities, and regulatory or law enforcement agencies, when required by law;
- intake teams, research groups, and Enterprise Investigations will communicate a commitment to confidentiality and maintain confidentiality in all areas related to the allegation; and
- the only teams authorized to communicate with an internal Reporting Party are Employee Relations, Legal, Enterprise Investigations and Conduct Management Case Management. These teams are required to develop and maintain appropriate scripts and procedures to address confidentiality issues.

A discloser may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if they believe they have suffered detriment.

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## **10. False or Misleading disclosure**

The protections mentioned above do not grant immunity for any false or misleading disclosure a discloser has engaged in that is revealed in their disclosure. The discloser is expected to have reasonable grounds to believe that any information he/she is disclosing is true, but will not be penalised if the information turns out to be incorrect. You must not make a report that you know is not true or is misleading. Where it is found that a Discloser has knowingly made a false disclosure, this will be considered a violation of [Wells Fargo Code of Ethics and Business Conduct](#) and may result in corrective action, up to and including termination of employment. In addition, there may also be potential legal consequences if you knowingly make a false disclosure.

## **11. Record Keeping**

All disclosures will be recorded as outlined in the Allegation Management Policy and related information, documents, records, reports and disclosures relating to the investigation of reported conduct will be confidentially stored and retained in an appropriate and secure manner.

## **12. Reporting and Review of this Policy**

All disclosures made under this policy (if any) will be presented to the Quarterly Board meeting as part of the compliance reporting. The compliance reporting provided to the Board will not identify individual disclosers.

This Whistleblower Policy is to be reviewed every two years and any material changes to the policy must be approved by the Wells Fargo International Finance (Australia) Pty Ltd Board of Directors in conjunction with the relevant local Compliance and regional approvals, including APAC Regulatory Compliance and APAC Conduct Office.

## **13. Ensuring fair treatment of individuals mentioned in a disclosure**

Wells Fargo have the following measures and/or mechanisms in place to ensure fair treatment of individuals mentioned in a disclosure (where applicable):

- disclosures will be handled confidentially and will be limited to team members with a specific business need-to-know, as required to perform allegation management functions or activities;
- each disclosure will be assessed and may be the subject of an investigation to understand all of the reported concerns;
- a discloser or any individual mentioned in the disclosure who is a current or former team member may access Wells Fargo's Employee Assistance Program; and
- any report of alleged detrimental conduct against a discloser, or any other person in relation to a disclosure will be investigated in accordance with the Speak up and Non-retaliation Policy regarding its' Team Members (Employees).

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#### **14. Availability of this Policy**

This Policy is made available to all employees on the [Wells Fargo Teamworks](#).

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