



CSL Speak Up Policy

1 What is the purpose of this policy?

CSL Limited and its subsidiaries (CSL) are committed to conducting business honestly, with integrity, and in accordance with its values and standards of expected behaviour as outlined in CSL's Code of Responsible Business Practices.

The CSL Board has approved this Policy in order to:

- encourage people to Speak Up if they become aware of Potential Misconduct;
- explain how to Speak Up and what protections a discloser will receive;
- outline CSL's processes for responding to Speak Up reports; and
- promote a workplace environment in which everyone feels safe, supported and encouraged to Speak Up.

CSL takes Speaking Up seriously. CSL will not tolerate anyone being discouraged from Speaking Up or being subject to detriment or retaliation 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 retaliated against or caused detriment to a person in connection with Speaking Up.

2 What is speaking up?

Anyone with information about Potential Misconduct is encouraged to report that information to a Recipient (i.e. to "Speak Up"). If in doubt, Speak Up.

The Recipients are set out in section 5 below.

3 What is Potential Misconduct?

Potential Misconduct is any suspected or actual misconduct or improper state of affairs or circumstances in relation to CSL, or an employee, officer, consultant or contractor of CSL.

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

Information about Potential Misconduct should be raised with a Recipient to allow the issues to be resolved most effectively.

Potential Misconduct does not generally include **personal work-related grievances**.

Personal work-related grievances are grievances relating to your employment that have implications for you personally (such as a disagreement between you and another employee or a decision about your promotion).

Generally, these grievances should be raised with your local HR representative or a Recipient to allow the issues to be resolved most effectively. In some cases, these grievances may also include Potential Misconduct.

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

- breach of laws or regulations;
- breach of the CSL Code of Responsible Business Practice or other CSL 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;
- victimisation or harassment;
- insider trading;
- deliberate release or non-authorized possession of proprietary or private data;
- conduct likely to damage CSL's brand, reputation or relationships with others (for example, customers, business partners, Governments and regulators);
- financial fraud or mismanagement;
- conduct likely to damage CSL's financial position;
- unauthorised use of CSL's confidential or proprietary information;
- conduct that represents a danger to the public or to the financial system;
- non-disclosure of a material cyber security breach;
- retaliating against or causing detriment to a person who Speaks Up; and
- deliberate concealment of the above.

Conversely, examples of personal work-related grievances which are generally outside the scope of Potential Misconduct under this Policy may include, but are not limited to:

- disagreements between employees;
- disagreements between staff and management;
- decisions about promotion; and
- decisions about remuneration and bonus structures.

4 Who can speak up?

Anyone with information about Potential Misconduct is encouraged to Speak Up. This includes all of CSL's current and past employees, directors, contractors, customers, suppliers and associates.

5 Who should I tell?

CSL encourages you to Speak Up to any of the following **Recipients**:

Non-Employees of CSL

- CSL Speak Up Hotline (<https://cslspeakup.ethicspoint.com>)

Employees of CSL

- CSL Speak Up Hotline (<https://cslspeakup.ethicspoint.com>)
- Regional Ethics & Compliance Officer/s or the Global Chief Ethics & Compliance Officer
- HR-related matters: Lead Counsel, Global Employment Law
- speakup@csl.com.au

For CSL employees, the contact details of the Recipients can be found on the intranet Ethics & Compliance Home Page and through the Global Address Book. You can make your report by email, telephone or in person.

The CSL Speak Up Hotline is an independent hotline service available globally that gives employees and other individuals the opportunity to report Potential Misconduct either online or via telephone call. Reports may be made anonymously, if so permitted in the relevant jurisdiction.

What information should I provide?

You should provide as much information as possible, including details of the Potential Misconduct, people involved, dates, locations and if any more evidence may exist.

When Speaking Up you will be expected to have reasonable grounds to believe 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.

Speaking Up may damage the career prospects and reputation of people who are the subject of serious allegations. Therefore, if your report is not made on reasonable grounds or is found to be malicious, deliberately misleading or frivolous, you may be subject to disciplinary action. Speaking Up is not about airing a grievance. It is about reporting real or perceived misconduct, malpractice, breaches of CSL policies or the law.

Can I make an anonymous report?

CSL encourages the reporting of Potential Misconduct, however we appreciate that Speaking Up can be difficult.

You can make an anonymous report if you do not want to reveal your identity (subject to the laws in some countries that may limit anonymous reporting). However, in certain cases, providing your name may make it easier to fully investigate and address your report and to offer you responsive feedback and support.

If you do not provide your name, any investigation will still be conducted as feasible under the circumstances.

If you do provide your name, it will be disclosed if you provide your consent, or in exceptional circumstances where disclosure is allowed or required by law (e.g. in dealings with a regulator). If you have concerns about this, you can discuss this with the Recipient.

8 How will CSL respond to a report?

All reports made under this Policy will be received and treated sensitively and seriously, and will be dealt with promptly, fairly and objectively.

- CSL provides the protections described at section 9 below when responding to or investigating reports.
- CSL's response to a report will vary depending on the nature of the report and the information provided. Your report may be addressed and resolved through formal investigation or through a non-investigative process, such as assisting employees through coaching, mentoring and monitoring.
- All reports will be assessed and considered by CSL and a decision made as to whether they should be investigated. Speaking Up does not guarantee a formal investigation in every case, and if you consent to CSL contacting you, CSL will let you know how it responds to your report, including whether an investigation will be/has been conducted. This may not occur until after an investigation has been concluded.
- Any investigations commenced will be conducted in a timely manner and will be fair and independent from any persons to whom the report relates.
- All personnel must cooperate fully with any investigations.
- Unless there are confidentiality or other reasons not to do so, persons to whom the report relates will be informed of the allegation at an appropriate time, and will be given a chance to respond to the allegations made against them.
- CSL has appropriate escalation procedures in place to deal with circumstances where the potential misconduct involves a danger to public health, senior management, a director or significant financial matters.

CSL is committed to protecting the wellbeing of all its employees. If you have not Spoken Up but would like additional support in relation to responding to an investigation or allegation, please contact your local HR representative or the Employee Assistance Program (if you are a current employee in Australia). For support and protections provided to those who Speak Up, please see section 9 below.

9 What protections exist if I speak up under the policy?

9.1 Protecting your identity

CSL will protect the identity of people who Speak Up as appropriate and consistent with applicable law. Your identity (and any information CSL has because of your report that someone could likely use to work out your identity) will only be disclosed if you give your consent to CSL to disclose that information or in exceptional circumstances where disclosure is allowed or required by law.

9.2 Protecting you from retaliation and detriment

No person may cause detriment to someone else (or threaten to do so) because of a belief that the person has or will Speak Up. Examples of detriment include retaliation, discrimination, harassment, causing physical or psychological harm, isolation, impact to an employee's performance and compensation, damaging property, and varying an employee's role or duties.

You should tell a Recipient listed in section 5 if you or someone else is being, or has been, subject to detrimental conduct in connection with Speaking Up. CSL will treat this very seriously. Any person involved in detrimental conduct will be subject to disciplinary action. In some circumstances, this may also be a criminal offence punishable by imprisonment.

9.3 Other protections available

CSL is committed to making sure that you are treated fairly and do not suffer retaliation or detriment because you Speak Up. The protections offered will depend on variables 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;
- access to CSL’s Employee Assistance Program (if you are a current employee in Australia) and additional support from CSL (such as counselling or other support services); and/or
- rectifying any detriment you have suffered consistent with applicable law.

CSL 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. In all cases, CSL will seek to offer appropriate support as practicable and consistent with applicable law.

Further information regarding the specific protections afforded under Australian law to persons Speaking Up whose matter is subject to such Australian law is available at Attachment 1 to this Policy.

10 Reporting

The CSL Audit and Risk Management Committee of the Board of Directors will on an annual basis receive a summary of all reports made under this Policy together with additional information about any material incidents raised. Individual reports may be escalated to the Board at any time as appropriate.

11 Further information

Any questions about this Policy or Speaking Up can be referred to the CSL Chief Ethics & Compliance Officer or to the CSL Speak Up Hotline.

This Policy will be posted on CSL’s public website and on the Company’s iNet sites. This Policy does not form part of terms of employment and may be amended from time to time. While this Policy will be implemented across all CSL Group companies, the principles of this Policy must be read in conjunction with and subject to the laws and regulations in the local environment in which each CSL Group company operates.

12 Attachment 1



ATTACHMENT 1
– CSL Group
Speak Up Policy