

Whistleblower Protection Policy

Baby Bunting's commitment to the Law

Baby Bunting is committed to the observance of all laws and the highest ethical standards. Compliance with laws relevant to how we conduct our business and interact with customers, including the Competition and Consumer Act 2010 (Cth), the Privacy Act 1988 (Cth) and the SPAM Act 2003 (Cth), is a critical element of this commitment.

For Baby Bunting, some important legal obligations under these laws means (for example) we must not:

- mislead or deceive our customers;
- make false or misleading representations about the goods or services we sell;
- sell unsafe products or products that do not comply with mandatory standards;
- engage in anti-competitive practices that are prohibited at law;
- fail to follow the procedures in our Privacy Policy designed to protect the personal information of our customers and others.

All Baby Bunting Team Members must observe the spirit and the letter of the law and exercise high standards of ethical conduct when acting on behalf of Baby Bunting or performing any duties for Baby Bunting.

We want you to report wrongdoing

The purpose of the Whistleblower Protection Policy is to encourage the reporting of certain behaviour through appropriate channels, and without fear of suffering detriment or reprisal.

The purpose of whistleblowing is to help Baby Bunting identify any behaviour that is unacceptable to Baby Bunting and is considered "disclosable conduct". Baby Bunting's whistleblower protection program is an important element in detecting illegal and unacceptable conduct, and providing protection to whistleblowers who disclose such conduct. At Baby Bunting we encourage all Team Members to report wrongdoing because this will lead to more effective compliance with the law and show that we take our obligations seriously.

What is reportable conduct

At Baby Bunting, Team Members (or former Team Members) can report any information that the whistleblower has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to Baby Bunting.

This may include conduct of a director, officer or employee of Baby Bunting that is fraudulent, negligent, a breach of trust, or a breach or duty, contravenes relevant legislation, or represents a danger to the public or the financial system.

If you think that a Baby Bunting Team Member is **doing the wrong thing** then you should report this behaviour.



Personal work-related grievances

Reports that involve a personal work-related grievance that relate to a Team Member's employment or former employment which may have had an impact on them personally (that are not connected to victimisation as a whistleblower) can and should be reported either internally through normal management processes or by using the Whistleblower Hotline.

Issues such as these that are related to human resources or employment matters are managed under separate mechanisms and policies such as the Code of Conduct. Generally, the provisions described in this policy (and the related legislation) will not apply to reports of personal work-related grievances.

Baby Bunting will protect and respect all eligible whistleblowers

A whistleblower will receive protection if they are considered an eligible whistleblower. A person is an 'eligible whistleblower' if they are, or have previously been, an officer, employee, supplier of goods or services, an associate, or a relative or dependant of these individuals.

Baby Bunting has appointed a Whistleblower Protection Officer whose role is to safeguard the interests of a whistleblower. Baby Bunting's Whistleblower Protection Officer is currently General Manager of HR. (The General Manager – Operations is the Whistleblower Protection Officer for reports of disclosable conduct relating to the General Manager of HR.)

Baby Bunting will ensure that whistleblowers are not personally disadvantaged by having made a report. Baby Bunting guarantees that:

- protected whistleblowers will not be prosecuted by Baby Bunting or disadvantaged by Baby Bunting in any way; and
- reports will be kept confidential and secure so that the whistleblower's identity is kept confidential.

This includes no action being taken against a protected whistleblower in the form of:

- dismissal;
- demotion;
- any form of harassment or intimidation;
- discrimination;
- current or future bias.

Baby Bunting will ensure a whistleblower is granted immunity from any internal disciplinary action for reporting conduct as a whistleblower. This immunity is conditional on the whistleblower having reasonable grounds to suspect the disclosable conduct.

This protection does not extend to consequences from a whistleblower's own involvement in any disclosable conduct.



When to make a report

We encourage all Baby Bunting Team Members to promptly reporting any disclosable conduct as soon as you become aware of the conduct. By stepping forward and raising concerns, you are fulfilling one of your responsibilities to Baby Bunting.

How to make a report

Baby Bunting has a Whistleblower Hotline dedicated to receiving reports from whistleblowers. The Whistleblower Hotline is operated by ProAct Link and reports (including anonymous reports) can be made:

by phone: 1800 888 340

by email: report@proactlink.com.au

online: www.proactlink.com.au

All reports to our Whistleblower Hotline are received only by Baby Bunting's Whistleblower Protection Officer.

You can make a report by contacting our Whistleblower Protection Officer.

You may also make a report to the CEO and Managing Director, CFO, or another officer of Baby Bunting, who will generally refer the matter to the Whistleblower Protection Officer.

You should provide as much information as possible to assist with the investigation of your report. You can make a report anonymously if you do not wish to be identified.

There is no requirement for disclosures to be made in a particular form. Disclosures may be made in writing (eg via email), in person or via telephone.

Confidentiality and security

Baby Bunting will take all reasonable steps to ensure all reports provided by a whistleblower, and the identity or information likely to lead to the identification of the whistleblower, will be kept confidential and secure by the Whistleblower Protection Officer and only disclosed to a person not involved in an investigation if the whistleblower consents to the disclosure or the law so requires.

What will happen if you make a report?

Baby Bunting has appointed a Whistleblower Investigations Officer who is currently the Group Legal Counsel. Once a report is made and received by the Whistleblower Protection Officer, the Whistleblower Investigations Officer will first consider whether it is appropriate and necessary to conduct an investigation, and if so, conduct an investigation to locate evidence that either substantiates or refutes the claims made by the whistleblower.



Investigations will be conducted without bias and the person(s) against whom the allegations or complaint is made will be given the right to respond to the Whistleblower Investigations Officer.

The Whistleblower Protection Officer will, to the extent possible, keep a whistleblower informed of the outcomes of the investigation of their report subject to the privacy and confidentiality considerations of the person(s) against whom the allegations or complaint is made.

Questions about this policy

If you have any queries about Baby Bunting's Whistleblower Protection Program or this policy, please contact Baby Bunting's Whistleblower Protection Officer who is the GM of Human Resources.