



CSL Group Speak Up Policy

Purpose and scope

CSL Limited and its subsidiaries (CSL) are committed to conducting business in accordance with our values that are the foundation of how we conduct ourselves and interact with each other, our clients, patients, donors, suppliers, shareholders, and other stakeholders. CSL is committed to fostering a culture of transparency and integrity as outlined in CSL Code of Responsible Business Practice and other CSL policies and standards.

CSL expects you to raise a concern when you suspect unlawful, unethical or otherwise improper conduct that involves CSL and may result in a serious violation of applicable laws and regulations, our Code of Responsible Business Practice, and internal policies and procedures. This assists CSL to take a timely action to protect CSL, our employees and our business environment.

The CSL Board has approved this Policy in order to:

- encourage people to Speak Up if they become aware of Potential Misconduct;
- provide multiple reporting channels to Speak Up confidentially or anonymously;
- 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, may be imposed on anyone shown to have retaliated against or caused detriment to a person in connection with Speaking Up.

This Policy applies to CSL Limited and is to be implemented across all CSL Group companies. As stated herein, “CSL” refers to CSL Limited and all CSL Group companies.

Policy

1 What is Speaking Up?

Anyone with information about Potential Misconduct is encouraged to report that information to an Eligible Recipient (i.e. Speak Up) through an appropriate channel. The Eligible Recipients are set out in section 3 below.

2 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 or an officer of CSL. You should Speak Up even if you are unsure if something is Potential Misconduct.

Information about Potential Misconduct should be raised with an Eligible 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 that can be raised 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 likely to cause material financial or reputational damage to CSL, its employees or a third party;
- conflicts of interest;
- anti-competitive behaviour;
- discrimination, victimisation, harassment or bullying as defined under locally applicable law or company policy;
- insider trading;
- deliberate release or non-authorized possession of proprietary or private data;
- conduct likely, if disclosed, to cause material damage to 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;
- tax evasion or money laundering;
- unauthorised use of CSL's confidential or proprietary information;
- conduct that represents a danger to the public or to a government or the financial system;
- non-disclosure of a material cyber security breach;
- human rights violations, such as forced labour or human trafficking;
- retaliating against or causing detriment to a person who Speaks Up or otherwise engages in any activity protected by law or company policy; and
- deliberate concealment of the above.

Conversely, Potential Misconduct does not generally include personal work-related grievances which should be reported to HR or Global Employment Law function in accordance with CSL HR processes.

Examples of personal work-related grievances may include, but are not limited to:

- disagreements between employees;
- disagreements between staff and management;
- employee discipline and performance management matters;
- decisions about the engagement, transfer or promotion of an employee;
- decisions about remuneration and bonus structures; and
- decisions to suspend or terminate an employee for performance or disciplinary reasons.

There may be instances where personal work-related grievances would be covered by this Policy and, in some cases, personal work-related grievances may qualify for legal protection. See Attachment 1 for details.

3 How can I report Potential Misconduct?

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

Employees of CSL

- CSL Speak Up Hotline (<https://cslspeakup.ethicspoint.com>) which offers an option to report online or via phone (attended in local language) or raise a question
- 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 Eligible Recipients can be found on the intranet Ethics & Compliance Home Page. You can make your report by email, telephone or in person.

Non-Employees of CSL, such as, but not limited to: suppliers, contractors, consultants, service providers, business partners, including their employees.

- CSL Speak Up Hotline (<https://cslspeakup.ethicspoint.com>) which offers an option to report online or via phone (attended in local language) or raise a question.

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 24 hours/7 days a week, 365 days a year. Reports may be made anonymously, if so permitted in the relevant jurisdiction.

While we encourage you to Speak Up to one of the Eligible Recipients listed above, there are certain other people to whom you can report and still receive the legal protections described in section 8 below, who are listed in Attachment 1.

4 What information should I provide?

You should provide as much information as possible, including details of the Potential Misconduct, such as:

- Your name, which will be kept confidential (refer to section 6 below), location and contact details (you may choose to stay anonymous – please refer to section 7 below).
- The nature of the Potential Misconduct.
- When and where did the Potential Misconduct occur.
- Who was involved?
- Whether you have already raised a concern with anyone in CSL and their response.
- Any evidence that supports your report, and where the evidence is located.
- Any further information that could help investigate your report.
- If you are concerned about possible reprisal for raising a concern.

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 this may be a breach of the Company's Code of Responsible Business Practice and will be considered a serious matter that may result in disciplinary action and you may not be eligible for the relevant protections. Speaking Up is not about airing a grievance. It is about reporting actual, potential or perceived misconduct, malpractice, breaches of CSL policies or the law.

5 How will my identity be protected (Confidentiality)?

CSL is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this Policy. CSL takes your protection seriously. Subject to your consent, measures which CSL may adopt to protect your identity may include some or all of the following, as appropriate in the circumstances:

- Redact personal information or references to you so your identity is not identified or identifiable.
- The Speak-Up matter will be handled and investigated by qualified personnel.
- Limit access to all information relating to a disclosure to those directly involved in managing and investigating the report.
- Store securely evidence provided by you and any identity or identifiable information will be redacted.
- Only the qualified personnel will have access to the evidence provided by you.
- Reminding each individual involved in handling and investigating a Speak-Up matter about the confidentiality requirements, including that an unauthorised disclosure of your identity may have serious consequences.

6 Can I make an anonymous report?

CSL encourages you to identify yourself when you make a report about Potential Misconduct because it will make it easier to investigate and address your report. However, we appreciate that Speaking Up can be difficult so you may choose to remain anonymous. CSL will respect your decision and your report will be conducted as best as possible in the circumstances.

CSL will assess the content and merit of your disclosure in the same way as if you had revealed your identity. However, an investigation may not be possible unless sufficient information is provided, and it may make it difficult to offer you the same level of practical support if we do not know your identity. You will still be entitled to protections under the law, as applicable (see Attachment 1).

If you do provide your name, it will only 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). Details of how your identity will be protected are described in section 8.1 below. If you have concerns about this, you can discuss this with the Eligible Recipient.

7 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, objectively and confidentially.

Once your report is received through an Eligible Recipient or channel, CSL will assess the Speak-Up matter. The following principles apply:

- CSL applies the protections described at section 8 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 may not result in 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 (to the extent permitted by law), and will be given a chance to respond to the allegations made against them.
- Any person involved in an investigation process must maintain strict confidentiality and do not disclose their involvement any further, including to their managers.
- 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.

Where an investigation identifies a breach of law, regulations, CSL's Code of Responsible Business Practice or internal policies or procedures, appropriate disciplinary action may be taken. This may include but is not limited to terminating or suspending the employment or engagement of a person(s) involved in any misconduct.

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 8 below.

8 What protections exist if I Speak Up under the Policy?

8.1 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. Refer to section 5 for measures which CSL may adopt to protect your identity.

If your report qualifies for legal protection as set out in Attachment 1, your identity and information that is likely to lead to another person identifying you has the benefit of these protections at law. If a person makes an unauthorised disclosure of your identity, the person may breach the law and you may be able to seek legal recourse. In some circumstances, this may also be a criminal offence.

8.2 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.

If your report qualifies for legal protection as set out in Attachment 1, you are legally protected from detriment. If a person causes detriment or victimises you, or threatens to do so, the person may breach the law and you may be able to seek legal recourse. In some circumstances, this may also be a criminal offence.

You should tell an Eligible Recipient listed in section 3 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.

CSL may take actions that are considered reasonable for the purpose of protecting a discloser from detriment, if the discloser's identity is known (e.g., moving a reporter who has made a disclosure on a Potential Misconduct in their immediate work area to another area to prevent them from detriment).

8.3 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.

9 Reporting

The CSL Audit and Risk Management Committee of the Board of Directors will on semi-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.

10 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 available 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.

Attachment



ATTACHMENT 1
– CSL Group
Speak Up Policy