

WESTPAC BANKING CORPORATION  
ABN 33 007 457 141

# Westpac Human Rights Position Statement and Action Plan

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OCTOBER 2024

Position Statement Owner: Chief Sustainability Officer

Effective date: May 2023

Version: 4.1

 **Westpac** GROUP

# 1 Purpose

This Human Rights Position Statement ('Position Statement') sets out Westpac Group's<sup>1</sup> commitments and approach to respecting and advancing human rights. It provides a lens through which Group policies, frameworks and strategies should be applied. It also sets out our expectations for our people and business partners (including customers and suppliers). This is our fourth Position Statement and it now integrates our position on child safeguarding.

Our Human Rights Action Plan ('Action Plan') sets out key actions we are taking to implement our Position Statement and areas of focus for improvement.

As one of Australia and New Zealand's largest financial services companies, we have a broad range of activities and relationships through which we may influence and impact the human rights of various stakeholders. We have a responsibility to respect human rights across our activities and relationships, as well as opportunities to support and advance human rights. Our responsibility includes providing for or cooperating in remedy where we identify that we have caused or contributed to human rights harm.

Our values and behaviours are intended to guide our people and shape our workplace and way of working. Seeking to respect human rights across our activities helps us to uphold our values and behaviours and deliver on our [purpose: creating better futures together](#).

# 2 Scope and coverage

We have a commitment to respect human rights across the Group. As reflected in this Position Statement and Action Plan, we are further progressed on implementation in Australia which represents the vast majority of our operations, and we continue to work on implementation and alignment as appropriate in the locations where we operate (refer to Action Plan for more information).

## ACKNOWLEDGMENT OF INDIGENOUS PEOPLES

Westpac acknowledges the First Peoples of Australia and recognises their ongoing role as Traditional Owners of the land and waters of this country, and we pay respect to Elders past and present. We extend that respect to Westpac's Aboriginal and Torres Strait Islander employees, partners, and stakeholders, and to the Indigenous Peoples in the other locations where we operate.

In Aotearoa (New Zealand) we also acknowledge tāngata whenua and the unique relationship that Iwi Māori share with all New Zealanders under Te Tiriti o Waitangi.

<sup>1</sup> In this Position Statement a reference to 'Westpac', 'Group', 'Westpac Group', 'we', and 'our' is to Westpac Banking Corporation ABN 33 007 457 141 and its consolidated subsidiaries. Unless otherwise stated, the Position Statement applies globally, incorporating all Westpac Group brands (including Westpac, St.George, BankSA, Bank of Melbourne, RAMS, Westpac Institutional Bank) and locations across Australia, New Zealand, Fiji, PNG, Asia, the United Kingdom, Germany and the United States, but excludes products provided through BT Funds Management (NZ) Limited (BTNZ), Margin Lending products, products provided through BT Financial Group and any other indirect exposures from our investment or lending activities (such as third-party managed funds). For more information on BTNZ's Sustainable Investment approach visit BTNZ's [Sustainable Investment Policy](#).

Any representations made in this document as to future actions, including forward-looking statements and commitments, are predictive in character. Whilst every effort has been made to ensure that the assumptions on which the relevant statement is based are reasonable, these statements and the implementation process and/or outcome(s) may be affected or impacted by incorrect assumptions and/or by known or unknown risks, uncertainties or events beyond the control of the Westpac Group. As a result, the ultimate outcome(s) may differ from the action(s) described in this Position Statement. Please refer to the full disclaimer at the back of this Position Statement.

### 3 Our commitment and approach to respecting and advancing human rights

We are committed to conducting our business in a way that respects the human rights of our people, business partners (including our customers and suppliers), the communities we support and in which we operate, as well as of others who may be impacted by our activities and business relationships.

This includes respect for internationally recognised human rights as set out in the *International Bill of Human Rights*<sup>2</sup> and the *International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work*.

We seek to deepen our understanding of the rights and principles set out in the *United Nations (UN) Declaration on the Rights of Indigenous Peoples (UNDRIP)*<sup>3</sup> and the *UN Convention on the Rights of the Child (UNCROC)*<sup>4</sup>.

We also support the *UN Guiding Principles on Business and Human Rights (UNGPs)* and we are working to incorporate them as the foundation of our human rights approach.

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Our focus areas are outlined below in more detail.

<sup>2</sup> The *International Bill of Human Rights* consists of the *United Nations Universal Declaration of Human Rights* and the two main instruments through which it has been codified, being the *International Covenant on Civil and Political Rights* and the *International Covenant on Economic, Social and Cultural Rights*.

<sup>3</sup> Visit the [2022-2025 Reconciliation Action Plan](#) which maps related UNDRIP articles to a number of our focus areas. Our leadership project focus relates to the right to free, prior and informed consent. In addition, region-specific documents may exist in our global locations.

<sup>4</sup> In particular, we seek to embed the principles outlined across Article 12 – respect for children's views, Article 16 – protection of privacy, Article 18 – responsibility of parents, Article 28 – access to education, Article 32 – protection from harmful work, and Article 34 – protection from sexual abuse. Visit *Our focus areas: Child safe organisation* and our [Safer Children, Safer Communities](#) program for more information, including examples of how we seek to operationalise these principles.

<sup>5</sup> Including those adverse human rights risks and impacts that we identify we have caused or contributed to, or to which we are directly linked.

<sup>6</sup> According to the UNGPs 'salient human rights issues' are those areas where the risks of the most severe negative impact to people's human rights are greatest, as a result of our activities or business relationships. These risks may arise for a range of reasons, both within and outside of the Group's control or influence. To date our assessment and reporting has primarily focused on Australia which represent the vast majority of our operations, and we continue to work on implementation and alignment as appropriate across the locations where we operate.

<sup>7</sup> Vulnerable or at-risk groups include people who may be disadvantaged, marginalised or excluded from society, such as children and young people, women, Indigenous peoples including Aboriginal and Torres Strait Islander peoples, people belonging to ethnic or other minorities, persons with disabilities and human rights defenders, among others.

<sup>8</sup> This includes region specific frameworks, policies, processes and decision-making where required or appropriate.

<sup>9</sup> With reference to the effectiveness criteria set out in the UNGPs, UN Guiding Principle 31, which outlines that grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

<sup>10</sup> Examples of remedies may include an explanation on the approach we have taken to an issue; an apology; a referral for additional support; and/or financial or non-financial compensation.

#### WE ARE COMMITTED TO

##### Human rights due diligence

- Undertaking ongoing human rights due diligence to identify, prevent, mitigate, and account for our human rights risks and impacts. Through this, we seek to: avoid causing or contributing to adverse human rights risks and impacts through our own activities or business relationships; and prevent and mitigate our adverse human rights risks and impacts<sup>5</sup>.
- Paying special attention to our 'salient human rights issues'<sup>6</sup> and to individuals and groups who may be particularly vulnerable or at-risk<sup>7</sup>.

#### OUR APPROACH

- We seek to integrate our commitments and human rights considerations into frameworks, policies, processes and decision-making across the Group, including processes for identification and management of risks and impacts associated with our operations (including our products and services) and for our business partners (including customers and suppliers)<sup>8</sup>. For more detail visit *Our focus areas and Management of our Position Statement and Action Plan*.
- We update and review our 'salient human rights issues' at least annually (visit *Addressing our 'salient human rights issues'* in our Action Plan).

##### Grievance mechanisms and remedy

- Providing or participating in effective grievance mechanisms for our stakeholders, including continuing to develop the capacity of our mechanisms<sup>9</sup> to hear from those who may be adversely impacted by our own activities or business relationships.
- Providing for, or cooperating in, the remediation of adverse human rights impacts where we identify that we have caused or contributed to these impacts. Where we have not caused or contributed to an adverse impact, but are directly linked to it, we recognise we may be able to play a role in remedy.
- Encouraging our people and business partners to speak up without fear of retribution.
- We provide, and will continue to build the capacity of, mechanisms through which our people, business partners and other stakeholders (including people who may be impacted by our activities or business relationships) can raise complaints, grievances and feedback and through which we can provide for or cooperate in remedy<sup>10</sup> (refer to *Feedback, complaints, and questions*).



## WE ARE COMMITTED TO

## OUR APPROACH

**Advancing  
human rights**

- Identifying opportunities to support and promote human rights.
- Our aim is to support change and drive common recognition and respect for human rights by leading with and learning from others.
- We seek opportunities to address shared challenges, influence and advocate for systemic change, and advance collective thinking and actions on human rights topics.
- We do this by delivering against our [strategy and purpose](#), [Sustainability Strategy](#) and [2022 - 2025 Reconciliation Action Plan](#), amongst other plans and initiatives across our locations; engaging in industry initiatives and forums; and partnering and collaborating with our stakeholders, including affected and potentially affected rights-holders (where appropriate), businesses, governments, academia and not-for-profit organisations.

**Building  
capability**

- Building human rights awareness and the knowledge and capabilities of our people as relevant to their roles.
- We provide and support training and development for our people, including to build human rights awareness and capability.

## WE ARE COMMITTED TO

## OUR APPROACH

**Upholding  
higher standards**

- Setting expectations through our Codes of Conduct<sup>11</sup> that our company and our people comply with laws and policies, some of which incorporate protection of human rights and labour rights.
- In addition to expectations in our Codes of Conduct, we seek to incorporate assessments of conflicts between domestic laws, regulations or customs and international human rights standards into our human rights due diligence processes, paying special attention to our 'salient human rights issues' and vulnerable or at-risk individuals and groups.
- If there is a direct conflict between an applicable domestic law and international human rights standards, we will look at ways to respect international human rights to the extent possible.

**Monitoring and  
communicating  
our progress  
and approach<sup>12</sup>**

- Tracking the implementation and effectiveness of our human rights commitments and approach.
- Disclosing our human rights progress and performance.
- We aim to regularly track, monitor, and evaluate the implementation of our human rights commitments, approach and actions, including where possible the effectiveness of actions taken to address identified risks and impacts. This includes seeking opportunities to do this collaboratively with affected stakeholders and rights-holders where appropriate.
- We aim to transparently report on our human rights approach, our performance and identified risks and impacts, and the actions taken to address them. This includes annually reporting on progress against our Action Plan.

<sup>11</sup> For example, the [Westpac Group Code of Conduct](#). WNZL operates under a separate but consistent Code of Conduct

<sup>12</sup> This is the approach we have taken in Australia to date and we continue to work to implement and align this approach as appropriate in our locations.

## WE ARE COMMITTED TO

### Stakeholder engagement

- Seeking opportunities to engage and collaborate with stakeholders including affected and potentially affected rights-holders, where possible and appropriate.

## OUR APPROACH

- We have stakeholder engagement and consultation processes to build our understanding and awareness of our risks, impacts and opportunities. This helps us to hear, understand and respond to stakeholder concerns and expectations. We look at ways to better incorporate these into our human rights due diligence processes.
- We also engage and collaborate with our stakeholders through our partnerships and by engaging in a range of initiatives and forums.

## GUIDING FRAMEWORKS, INITIATIVES, AND STANDARDS

The following additional instruments and frameworks help to guide our commitments and approach:

- [UN Sustainable Development Goals](#)
- [The Principles of the UN Global Compact](#)
- [UN Principles for Responsible Banking](#)
- [UN Women's Empowerment Principles](#)
- [Children's Rights and Business Principles](#)
- [UNESCO Recommendation on the Ethics of Artificial Intelligence](#)
- [UN Guiding Principles Reporting Framework](#)
- [Organisation for Economic Co-operation and Development \(OECD\) Guidelines for Multinational Enterprises](#)
- [Equator Principles](#)
- [Australia's National Principles for Child Safe Organisations](#)
- [Australia's National Plan to End Violence against Women and Children 2022 - 2032](#)



## 4 Our focus areas

Our human rights approach is focused on implementing our commitments across each of our roles as a:

- A. FINANCIAL SERVICES PROVIDER**
- B. LENDER**
- C. EMPLOYER**
- D. PURCHASER OF GOODS AND SERVICES**
- E. SUPPORTER OF COMMUNITIES**
- F. CHILD SAFE ORGANISATION**

Across these roles, we seek to address our most ‘salient human rights issues’<sup>13</sup>.

We also pay particular attention to:

### Privacy, consent and transparency

Seeking to protect the privacy of our employees and customers’ personal information, be transparent about the way their information is handled, and comply with our privacy obligations.

### Data, emerging technologies and the digital future

Strengthening the way we govern our use of data while seeking to respect human rights as we develop and use new and evolving technologies, such as artificial intelligence (AI) and machine learning (ML), and as we continue towards further digitisation and automation.

### Free, prior and informed consent (FPIC)

Improving our understanding of FPIC as it relates to lending and seeking to establish leading practices that we can embed across priority operations and share with industry, customers, communities and other stakeholders<sup>14</sup>.

### Climate change and the environment

Understanding the interrelationship between human rights and climate change and other environmental topics.

<sup>13</sup> This reflects our focus in Australia to date.

<sup>14</sup> Visit our [2022-2025 Reconciliation Action Plan](#). Our leadership project focus relates to the right to free, prior and informed consent

## A Financial Services Provider

Our [purpose](#) is to create better futures together.

We expect our customers to respect human rights and meet the requirements of our [Position Statements](#) where applicable.

Where we identify that a customer's practices are inconsistent with our expectations, where appropriate, we seek to use our influence, including by engaging with the customer as appropriate to address the issue. We may consider whether application of conditions will sufficiently manage the risks, or else we may decline the transaction. Any decision on disengagement with a customer is taken on a case-by-case basis in line with the commitments in this Position Statement. Our aim is to prevent our involvement in serious adverse human rights impacts and mitigate these if they occur, with a focus on improving outcomes for people.

We implement our commitments through a range of policies and programs which support us to:

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**Do the right thing by our customers**, as in our Codes of Conduct.

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Raise awareness of, and act on, evolving risks of **discrimination against customers**.

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**Offer fair and responsible products and services** that are inclusive, accessible and appropriate to meet the diverse needs of customers.

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**Mitigate the risk of our products and services being exploited** for financial crime and other criminal activities, including those that could adversely impact human rights.

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**Provide extra care** for customers experiencing vulnerability or harm, including but not limited to victims and survivors of domestic and family violence, financial abuse, cyber abuse, fraud and scams.

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**Use our influence and dialogue** to seek to prevent and mitigate adverse human rights impacts. This may include looking at ways to work with and encourage our customers to establish or participate in effective operational-level grievance mechanisms for affected individuals and communities and to provide for, or cooperate in, remedy for harm.

## B Lender

As a lender to commercial and institutional customers, we seek to implement our commitments through our processes and our Position Statements, which set out our approach to:

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**Identifying and assessing relevant human rights risks** at a customer and transaction level.

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**Mitigating high residual ESG risks**, including risks likely to cause major or severe human rights impacts. If the identified risks do not meet our risk appetite then we may consider whether application of conditions will sufficiently manage the risks, or else we may decline the transaction.

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Providing **project finance in line with the Equator Principles**.

## C Employer

As an employer we are committed to respecting the human rights and labour rights of our employees.

Our Codes of Conduct sets out our expectations on how we aim to work and behave in a manner consistent with respect for human rights.

**We seek to implement our commitments through our people policies and programs, which aim to:**

Provide an **inclusive, diverse and accessible work environment** free of unlawful discrimination, harassment (including sexual harassment), bullying, adverse action, vilification and victimisation.

Recognise our employee's rights to **form and/or join trade unions and to bargain collectively**.

**Engage our people to help further build an inclusive culture** and influence positive change, including through employee advocacy groups.

**Fairly pay and reward** our people.

Provide a **safe, secure and injury free workplace**, that enriches the wellbeing of our people and prevents harm, by reducing the potential for work-related physical and mental injuries and ill-health.

Provide and support **ongoing training and development**, including to build human rights awareness and capability.

Reduce the risk of **modern slavery or labour rights exploitation** in our workforce.

## D Purchaser of goods and services

As a purchaser of goods and services, our goal is to build relationships and collaborate openly with suppliers to maximise the positive, and mitigate any negative, human rights impacts directly linked to our purchasing.

We seek to implement our commitments through our [Responsible Sourcing Program](#) which is designed to support the identification, assessment, prevention, mitigation, monitoring and remediation of ESG (including human rights) risks and impacts.

Where we identify that a supplier's practices are inconsistent with our expectations, where appropriate, we seek to use our leverage and influence, including through dialogue with the supplier, to address the issue and improve outcomes for people. Where a supplier is unwilling to mitigate high residual ESG risks, including risks likely to cause major or severe human rights impacts, we may consider disengagement on a case-by-case basis in line with the commitments in this Position Statement.

**Our Responsible Sourcing Code of Conduct sets expectations for our suppliers, including how they:**

**Respect human rights, including labour rights**, in their operations, supply chain and other business relationships and address any adverse human rights impacts.

Foster **fair, accessible, safe and inclusive workplaces**, treat all employees fairly, ethically, respectfully and with dignity, and have protections against direct and indirect discrimination, bullying and harassment.

Ensure all direct and indirect employees are **legally entitled to work, are provided with legally required wages, entitlements and fair working conditions**, and respect the rights to **freedom of association and collective bargaining**.

Ensure they have policies and/or processes in place to **identify, mitigate and address any form of modern slavery or labour rights exploitation** within their operations and supply chain.

**Comply with all applicable laws and regulations**, including those relating to the **direct or indirect employment of children**, and ensure these are abided by in their subcontracting relationships as well as setting clear expectations of their supply chains regarding the prohibition of underage labour and children performing hazardous work.

This is the approach we have taken in Australia to date and we continue to work to implement and align this approach as appropriate across the locations where we operate<sup>15</sup>.

<sup>15</sup> For example, our Westpac New Zealand Limited [Responsible Sourcing Principles](#).



## E Supporter of communities

We have a long history of supporting the communities we operate in and where our people live and work, including through economic and social development initiatives. Our [Sustainability Strategy](#) integrates our purpose and seeks to support and create value for our customers, communities, and the broader economy.

We seek to implement our commitments through our Action Plans (including our [Access and Inclusion Plan](#) and [Reconciliation Action Plan](#) amongst other plans and initiatives across our locations), community partnerships, and the support that we provide for a number of philanthropic foundations<sup>16</sup>, trusts and charitable organisations.

### These seek to:

Help when it matters most at a personal and local level, by **supporting customers and businesses through times of change and hardship** and **supporting their financial wellbeing**.

Help build a stronger, more inclusive society and drive positive change by **supporting a select but diverse range of charities, businesses and social enterprises** and backing people with the ideas and drive to make positive change.

Collaborate for impact through **knowledge sharing and learning from partners** to help solve global challenges where finance can play a role, including through respecting human rights and supporting the transition to a climate resilient future.

## F Child safe organisation

This section sets out Westpac's Child Safeguarding Position Statement<sup>17</sup>. Refer to our Action Plan for how we plan to strengthen our focus on child safeguarding.

Since the AUSTRAC civil proceedings in December 2019, we have continued to build our understanding of existing and emerging risks to children and young people in physical and online environments and our own knowledge in promoting the financial safety of children and young people who access our products and services.

We recognise that the need for a child safe culture extends beyond organisations that engage directly with children and that we have a role to play in identifying, preventing, mitigating and accounting for our adverse human rights impacts related to children and young people. While we cannot entirely eliminate risks, we can work to enhance existing processes that seek to identify, prevent and mitigate harm, and play a role in advancing the fulfilment of children's and young people's rights where relevant to our business.

### While our direct engagement with children and young people can be limited, we may be connected to impacts on their rights and wellbeing through:

- Customers exploiting our financial platforms and products.
- Design of products and services that may not fully take into account the interests of children and young people, including those that might need extra care.
- Gaps in screening during customer onboarding and recruitment processes that may increase potential child exploitation risks.
- Occurrences of the worst forms of child labour, such as child trafficking, forced or compulsory labour, in our supply chain and/or the supply chains of our suppliers and customers.
- Our access to, and handling practices of, customer personal information, where the customer is a child or young person.
- Accessing inappropriate information relating to children using Westpac technology.
- Inappropriate interactions with children and young people in physical environments such as our branches or workplaces.

<sup>16</sup> Visit our [Family of Giving](#)

<sup>17</sup> Further detail is available in the [Child Safeguarding at Westpac - Supplement](#)

## F Child safe organisation

To date, we have considered child safeguarding in an Australian context only; however, our goal is to assess child safeguarding risks and impacts, if any, across all operations as part of our annual review of our 'salient human rights issues'.

### The principles that guide and inform our child safeguarding approach are:

**Safety by design:** where applicable, we evaluate the fairness and suitability of our products and services for children and young people, including with consideration for any actual or potential risks, adverse impacts or opportunities to create a positive impact.

**Include the voice of children and young people:** when making decisions that may affect their wellbeing, our approach is informed by working with organisations that involve and represent the voices of a diverse group of children and young people, including Indigenous children, those in out-of-home care and those with disabilities.

**Promote responsible financial behaviours for children and their parents and carers:** we seek to encourage safe and responsible spending and saving behaviours while helping to increase financial literacy and awareness.

**Set clear expectations for employees, contractors, and suppliers:** in relation to child safety and wellbeing, which are guided by our [Responsible Sourcing Code of Conduct](#) and [Code of Conduct](#). If an employee or contractor is found not to meet expectations, we have a consequence management framework to guide our approach to disciplinary actions.

**Mitigate risks for children across financial transactions:** we will, where applicable, continue to review and refine our approach through risk assessments across our products and services, channels, jurisdictions, and our processes for customer due diligence, payment and risk-based customer screening and transaction monitoring.

**Partner for progress:** we seek to partner with a range of stakeholders to deepen our understanding of their expectations around our child safeguarding practices and to raise our awareness of emerging risks and trends in relation to child rights, protection and safety.



## 5 Management of our Position Statement and Action Plan

### Application and implementation

We continue work to incorporate our human rights commitments and approach across a range of policies, [Position Statements](#), frameworks and Action Plans that support our day-to-day operations (refer to *Related frameworks, policies, Position Statements and Action Plans*).

Our aim is to continue to improve these documents, including in how they reflect and embed our human rights commitments, and our supporting risk management frameworks, processes and tools, due diligence, training and our overall approach to managing ESG risk.

Breaches of this Position Statement are expected to be managed in accordance with our Incident Management Policy.

### Development and review

This Position Statement was developed with input from external and internal specialists with human rights expertise, as well as from representatives across the business that are responsible for related policies, position statements and frameworks (refer to *Related frameworks, policies, Position Statements and Action Plans*).

We aim to review our Position Statement annually, or as needed, so it remains relevant and aligned with our purpose.

### Governance and oversight<sup>18</sup>

Westpac has a governance structure to oversee implementation of our human rights commitments and approach:

- Our Position Statement and Action Plan is reviewed by the Environment, Social, Governance and Reputation (ESGR) Committee, which is an executive level committee chaired by our CEO. It is also reviewed and approved by the Board.
- The Board has oversight of our Group response to human rights. The CEO has overall accountability for the execution of our response to human rights, and management of actions are delegated to the Executive Team as appropriate.
- Day-to-day responsibility for embedding human rights in our operations sits across various teams. The Group Sustainability team advises the ESGR Committee and the business on sustainability strategy, policy, and performance. The team is responsible for developing this Position Statement, and managing our overall program on human rights, including our modern slavery actions.
- Divisional Risk Committees consider sustainability risks in line with the Group's Position Statement and Action Plan. Divisional management teams operationalise and apply the Group Sustainability Risk Management Framework, Group ESG Credit Risk Policy, and Board Risk Appetite Statement (RAS). Dedicated Divisional ESG teams or programs lead the implementation of sustainability policies and processes.
- Additional specialist committees, with external members, advise on different focus areas, including the Stakeholder Advisory Council, Westpac Indigenous Advisory Committee, and the Safer Children, Safer Communities Roundtable.

<sup>18</sup> Reflects Group-wide governance structure. In certain regions, additional regional governance structures may also be in place. Refer also to footnote 1.



## 6 Related frameworks, policies, position statements and action plans<sup>19</sup>

This table outlines a number of documents that support our human rights commitments and approach.

ROLE	RELATED POLICIES AND POSITION STATEMENTS
<b>Across multiple roles</b>	<ul style="list-style-type: none"> <li>– Our <a href="#">Position Statements</a></li> <li>– <a href="#">Code of Conduct</a></li> <li>– <a href="#">Climate Change Position Statement and Action Plan</a></li> <li>– <a href="#">Natural Capital Position Statement</a></li> <li>– <a href="#">Child Safeguarding at Westpac: Supplement</a></li> <li>– <a href="#">Safer Children, Safer Communities work program</a></li> <li>– <a href="#">Reconciliation Action Plan</a></li> <li>– <a href="#">Access and Inclusion Plan</a></li> <li>– <a href="#">Speaking Up Policy</a></li> <li>– Group Complaints Management Policy</li> <li>– Customer Vulnerability Policy</li> <li>– Risk Management Framework</li> <li>– <a href="#">Sustainability Risk Management Framework</a></li> <li>– Operational Risk Management Framework</li> <li>– Data Risk Management Policy</li> <li>– Westpac’s Committed AI Principles</li> <li>– Group Model Risk Policy</li> <li>– <a href="#">Westpac Privacy Statement</a></li> <li>– Westpac Privacy Policy</li> </ul>
<b>Financial services provider</b>	Financial Crime Risk Management Framework and supporting policies including the <a href="#">Westpac Group Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Policy</a> , <a href="#">Group Sanctions Statement</a> and <a href="#">Group Anti-Bribery and Corruption Policy</a> .
<b>Lender</b>	<ul style="list-style-type: none"> <li>– ESG Credit Risk Policy</li> <li>– <a href="#">Sustainable Finance Framework</a></li> </ul>
<b>Employer</b>	<ul style="list-style-type: none"> <li>– <a href="#">Diversity, Equity &amp; Inclusion Policy</a></li> <li>– Enterprise Agreements and other Employment Agreements</li> <li>– <a href="#">Discrimination, Harassment &amp; Bullying Policy</a></li> <li>– <a href="#">Sexual Harassment Policy</a></li> <li>– <a href="#">Health Safety &amp; Wellbeing Statement of Commitment</a></li> </ul>
<b>Supporter of our communities</b>	<ul style="list-style-type: none"> <li>– <a href="#">Sustainability Strategy</a></li> <li>– Charitable Donations Policy</li> <li>– <a href="#">Family of Giving</a></li> </ul>
<b>Purchaser of goods and services</b>	<ul style="list-style-type: none"> <li>– <a href="#">Responsible Sourcing Code of Conduct</a></li> <li>– <a href="#">Supplier Inclusion and Diversity Principles</a></li> </ul>

<sup>19</sup> Not all documents are publicly available. In addition, region-specific documents may exist in our global locations.



## 7 Feedback, complaints and questions<sup>20</sup>

### Westpac Whistleblower Policy

The Westpac Group [Speaking Up Policy](#) encourages current and former employees (including contractors, temporary employees and secondees), brokers, service providers and suppliers (including their current and former employees) to raise any concerns about our activities or behaviours that may be unlawful or unethical, including human rights concerns.

The [Speaking Up Policy](#) outlines how eligible persons can speak up under the policy. For our current employees, this may be via their People Leader or dedicated specialist human resources and risk teams.

### Employee Grievance Process and workplace matters

Employees are actively encouraged to speak up about concerns or risks impacting them or others in the workplace, including sexual harassment, discrimination, bullying or harassment, health, safety and wellbeing (HSW), compliance and/or matters that may impact our customers, or other human rights concerns. Westpac policies, practices, training and reporting processes enable the reporting and addressing of raised concerns, including prompting a formal workplace investigation by a specialist Human Resource (HR) and/or HSW team when required.

Employees can raise a concern via our usual business channels, including via their People Leader, HSW hazard and incident management system and/or dedicated channels managed by specialist human resources and risk teams. Former employees can raise historical workplace concerns by contacting a senior leader or the HR Service Centre, and these concerns are referred to the relevant HR team for review and resolution.

Employees in Australia can also raise concerns about matters arising under the Westpac Group Enterprise Agreement (EA) or National Employment Standards in accordance with the disputes process under our EA. Employees may appoint a representative at any stage of the dispute resolution process, including a union, legal or other representative.

### Feedback and Complaints process

We strive to provide the best possible service for our customers and to do our best to resolve any concerns, including human rights concerns, quickly and fairly.

Our public [Complaints Policy](#) provides guidance on how customers may provide feedback or lodge a complaint. Guidance is also available for customers with accessibility requirements, in various languages, and in an '[Easy English Guide](#)' which can be found on our '[Feedback and complaints](#)' website.

Customers can raise feedback or a complaint:

- By calling us. Telephone numbers are set out in the Complaints Policy.
- Online via Internet Banking or our banking App.
- By emailing us at: [westpaccustomersolutions@westpac.com.au](mailto:westpaccustomersolutions@westpac.com.au) or by writing to us. Postal address is set out in the Complaints Policy.
- In-person by visiting us in branch or speaking to your Relationship Manager or Private Banker.
- By calling the [Indigenous Call Centre](#) team, Yindiyamarra.
- By calling the [National Relay Service](#).

<sup>20</sup> These mechanisms operate in Australia. Certain locations operate region-specific feedback and complaints mechanisms.

The Group also has a [Customer Advocate](#) who can be contacted by completing a [secure feedback form](#) and whose role is to listen to customers and recommend changes be made to bank policies, procedures and processes where appropriate.

Customers and members of the public (including those who may be impacted through a Westpac business partner, such as a customer) are also able to raise feedback or a complaint online via Westpac's '[Feedback and Complaints](#)' form. Feedback and complaints can also be received via social media or independent bodies such as the Australian Financial Complaints Authority (AFCA) and Australian Human Rights Commission.

### Sustainability-related feedback and complaints

Any member of the public (including those who may be impacted through a Westpac business partner, such as a customer) is able to raise feedback and complaints about sustainability-related matters, including human rights, environmental or climate change concerns linked to our operations, products or services.

Anyone can raise a concern by contacting the Westpac Group Sustainability team at [sustainability@westpac.com.au](mailto:sustainability@westpac.com.au).

<sup>20</sup> These mechanisms operate in Australia. Certain locations operate region-specific feedback and complaints mechanisms.



## B Human Rights Action Plan:

### 1 Our progress and the road ahead

Westpac has a long history of social impact and human rights leadership. In 2002 we became a founding member of the UN Global Compact and in 2015, we published our first Human Rights Position Statement.



This is our fourth Action Plan, and the first where we have specifically integrated our position and actions on child safeguarding.

We are proud of the progress made against our human rights actions and the outcomes they have achieved for our people, partners, customers and society. We provide further details on our progress against our Action Plan in our annual disclosures including our annual [Modern Slavery Statement](#).

However there remains much to be done as we continue our work to evolve our human rights approach, including across our global locations as appropriate. We recognise the need to work together across the economy and community - to address systemic challenges and achieve greater outcomes than we could alone. The AUSTRAC civil proceedings in 2019 reinforced the importance of acting on risks and impacts to people. In that case, we took steps to provide for, or cooperate in remedy for harm and strengthen our human rights approach - including in relation to child safeguarding.

#### With this fourth Action Plan we maintain our focus on:

- Identifying and responding to our 'salient human rights issues', including our human rights risks and impacts.
- Strengthening the effectiveness of our grievance mechanisms and approach to remedy.
- Supporting and advancing human rights through a just and inclusive transition.
- Embedding our approach as a child safe organisation.
- Strengthening the foundations of our human rights approach.



## 2 Our plan

These are the key areas of strategic focus guiding our Action Plan. In addition, a key priority is to continue our work to implement and align our approach as appropriate in the locations where we operate.

We aim to implement the actions in our Action Plan by May 2026 unless otherwise specified. We will continue to review our progress and aim to update and refine our Action Plan as needed so it remains relevant and aligned with our commitments and ambition.

	1. ADDRESSING OUR 'SALIENT HUMAN RIGHTS ISSUES'	2. STRENGTHENING GRIEVANCE MECHANISMS AND APPROACH TO REMEDY <sup>21</sup>	3. SUPPORT AND ADVANCE HUMAN RIGHTS THROUGH A JUST AND INCLUSIVE TRANSITION	4. STRENGTHENING A FOCUS ON CHILD SAFEGUARDING <sup>22</sup>	5. STRENGTHENING THE FOUNDATIONS OF OUR HUMAN RIGHTS APPROACH
<b>Strategic focus</b>	<b>RESPECT FOR HUMAN RIGHTS</b>	<b>RESPONSE TO OUR IMPACT</b>	<b>ADVANCE HUMAN RIGHTS</b>	<b>INTEGRATE CHILD SAFEGUARDING</b>	<b>FOCUS ON THE FUNDAMENTALS</b>
<b>Objective</b>	<b>Deepen our understanding of our 'salient human rights issues' and our potential and actual impacts on people. This will help to inform and better target our approach to human rights due diligence and risk management, so we can seek to better prevent and address harm and advocate for positive social outcomes.</b>	<b>Strengthen our grievance mechanisms where appropriate and necessary so they are effective and fit-for-purpose and inform the role we play in remedy.</b>	<b>As part of our Net-Zero Banking Alliance (NZBA) commitment we seek to consider and address impacts on people (both adverse and positive) associated with climate change and the transition to a net-zero economy<sup>23</sup>.</b>	<b>Integrate our child safeguarding commitments across critical risk areas of the bank.</b>	<b>Continue to strengthen the foundations of our human rights approach to drive improved progress, performance and risk management.</b>
<b>What we will do</b>	<p>1.1 Conduct a 'salient human rights issues' assessment with a focus on our Australian, New Zealand and Pacific locations, validating 'salient issues' with internal and external stakeholders, and identifying ways to better address them within the foundations of our human rights approach.</p> <p>We will conduct this assessment across our roles as a financial services provider, lender, purchaser of goods and services, employer and a supporter of communities.</p>	<p>2.1 Review and seek to strengthen the effectiveness<sup>24</sup> of our grievance mechanisms and our approach to remedy, including for those who are more vulnerable, or at risk, or who may face barriers to accessing these mechanisms. This will include an initial focus on grievance mechanisms for children (minors) and young people and those impacted through financing.</p>	<p>3.1 Support customers to transition to a net-zero economy, and where relevant, to understand how they will manage just transition risks, and continue work to understand how we might help to drive financing to support the advancement of positive social and human rights outcomes.</p> <p>3.2 Identify ways we might support vulnerable customers and communities impacted by climate change and the transition to a net-zero economy.</p> <p>3.3 Build our understanding of the interrelationship between human rights and climate change impacts, and seek to establish principles to guide decision-making and our engagement with customers.</p>	<p>4.1 Take steps to better integrate safety by design principles into our product and lifecycle process.</p> <p>4.2 Design product and service features for children and young people and their parents and carers that promote safe and responsible financial behaviours and prevent misuse.</p> <p>4.3 Manage and monitor modern slavery risks, including child labour risks, in our supply chain.</p> <p>4.4 Undertake due diligence in areas of our supply chain which are at higher risk of modern slavery (including the worst forms of child labour).</p> <p>4.5 Integrate and enhance consideration for child sexual exploitation and abuse across our financial crime processes.</p> <p>4.6 Prioritise the reporting of all suspected cases of child sexual exploitation to AUSTRAC within one business day of a suspicion being formed<sup>25</sup>.</p>	<p>5.1 Take steps to better incorporate our commitments and approach into internal processes, business controls and risk management policies and practices across our Group locations.</p> <p>5.2 Enhance the training and capability building programs for our people on human rights, including modern slavery, as relevant to their roles.</p> <p>5.3 Develop a human rights impact monitoring and evaluation (M&amp;E) framework to enhance our approach to tracking and reporting on our human rights impact and performance as well as the effectiveness of our modern slavery actions.</p> <p>5.4 Improve visibility and engagement on our human rights progress and performance at Board and executive levels through stronger integration into Group ESG governance structures.</p> <p>5.5 Refine our human rights disclosures based on the results of our 'salient human rights issues' assessment and enhance the reporting of progress against our Human Rights Action Plan and the effectiveness of our human rights and modern slavery actions.</p>

<sup>21</sup> Our primary focus will initially be on our Australian operations.

<sup>22</sup> Our primary focus will initially be on our Australian operations. Further detail available in the [Child Safeguarding at Westpac - Supplement](#).

<sup>23</sup> Visit our [Climate Change Position Statement and Action Plan](#).

<sup>24</sup> With reference to the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights, UN Guiding Principle 31, which outlines that grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

<sup>25</sup> AUSTRAC deadline for reporting is within three business days. Visit <https://www.austrac.gov.au/business/how-comply-and-report-guidance-and-resources/reporting/suspicious-matter-reports-smrs/submitting-your-smr>



# Disclaimer

The information in this document is general background information about the Group and its activities as at the date of this report. It is given in summary form and is therefore not necessarily complete. It is not intended that it be relied upon as advice to investors or potential investors, who should be seeking independent professional advice depending on their specific investment objectives, financial situation or particular needs. The material contained in this document may include information, including, without limitation, methodologies, modelling, scenarios, reports, benchmarks, standards, tools, metrics and data, derived from publicly available or government or industry sources that have not been independently verified. No representation or warranty is made as to the accuracy, completeness or reliability of the information.

This document contains statements that constitute “forward-looking statements” within the meaning of Section 21E of the US Securities Exchange Act of 1934. Forward-looking statements are statements about matters that are not historical facts. Forward-looking statements and metrics appear in a number of places in this document and include statements regarding our current intent, belief or expectations with respect to our business and operations, macro and micro economic and market conditions, results of operations and financial condition, capital adequacy and risk management, including without limitation, human rights issues, climate change, net-zero, emissions intensity and other sustainability related statements, commitments and targets, projections, scenarios, pathways, forecasts and metrics, forecasted economic indicators and performance metric outcomes, financial support to certain borrowers, indicative drivers, estimated emissions and other proxy data. Forward-looking statements may also be made by members of Westpac’s management, directors, officers or employees (verbally or in writing) in connection with this document. Such statements are subject to the same limitations, uncertainties, assumptions and disclaimers in this document.

We use words such as ‘will’, ‘may’, ‘expect’, ‘indicative’, ‘intend’, ‘seek’, ‘would’, ‘should’, ‘could’, ‘continue’, ‘anticipate’, ‘believe’, ‘probability’, ‘risk’, ‘aim’, ‘target’, ‘plan’, ‘estimate’, ‘outlook’, ‘forecast’, ‘goal’, ‘guidance’, ‘ambition’, ‘assumption’, ‘projection’, or other similar words that convey the prospective nature of events or outcomes and generally indicate forward-looking statements. These forward-looking statements reflect our current best estimates, judgements, assumptions and views as at the date of this document with respect to future events and are subject to change, certain known and unknown risks and uncertainties and assumptions and other factors which are, in many instances, beyond the control of Westpac, its officers, employees, agents and advisors, and have been made based upon management’s current expectations, understandings or beliefs concerning future developments and their potential effect upon us. Although management currently believes these forward-looking statements have a reasonable basis, there can be no assurance that future developments or performance will be in accordance with our expectations or that the effect of future developments on us will be those anticipated. There is a risk that the best estimates, judgements, assumptions, views, models, scenarios, projections used may subsequently turn out to be incorrect. Actual results, performance, conditions, circumstances or the ability to meet commitments and targets could differ materially from those we expect or are expressed or implied in such statements, depending on various factors, including without limitation significant uncertainties in climate change and sustainability related metrics and modelling as well as further development of methodologies, reporting or other standards which could impact metrics, data and targets (noting that connections to human rights impacts, and climate and sustainability science, standards, methodologies and reporting are subject to rapid change and development). There are usually differences between forecast and actual results because events and actual circumstances frequently do not occur as forecast and their differences may be material. Factors

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## ACCESSIBILITY SUPPORT

Westpac welcomes calls through the National Relay Service. If you are deaf, hard of hearing, or have speech/communication difficulty, choose your access option detailed on the [National Relay Service](#).

Where English is a second language, contact us and a banker can arrange a language interpreter.

Visit [Westpac Access and Inclusion](#) for further information on our more accessible products and services for people with disability, who are neurodivergent or where English is a second language.

## Contact us

For questions and comments,  
please contact Westpac Group Sustainability

 [sustainability@westpac.com.au](mailto:sustainability@westpac.com.au)

 [westpac.com.au/sustainability](https://westpac.com.au/sustainability)