

**Policy Name**

**Whistleblower Protection**

Policy Approver / Custodian

Board Governance & Remuneration Committee / CRO

Review cycle

Every 2 years or as required

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## Notes

Applies To	All levels and all Business Units of the organisation.
Reason for Policy	<p>Provide an avenue for the disclosure of misconduct, the preservation of confidentiality, and additional legislative protection where an eligible disclosure.</p> <p>The Policy supports compliance with:</p> <ul style="list-style-type: none"> <li>- the Australian 2019 whistleblowing protection regulations</li> <li>- the relevant provisions of the Corporations Act (s.1317AA- AE), Tax administration Act and Banking Act;</li> <li>- the Australian Standard 8004 – 2003 (Whistleblower Protection Program for Entities);</li> <li>- the disclosure requirements in Cuscal’s Compliance, Conflict of Interest, People Management and Fraud policies as well as the Code of Conduct; and</li> <li>- the Public Interest Disclosure Act 2013, should Cuscal provide services or goods to the Commonwealth Government (or one of its prescribed authorities).</li> </ul>
Policy Summary:	<p>This document is designed to help maintain an ethical culture, encouraging Cuscal’s officers, employees and contractors, affiliates, suppliers and volunteers to report any corporate misconduct. This document also defines the principles and process that Cuscal applies in its protection of the identity and treatment of <b>whistleblowers</b> and provision of a swift and diligent investigation of any matters raised to reduce the risk to Cuscal’s reputation, financial position, or the wellbeing of those impacted by the potential misconduct.</p>

## Document version control

Amendments		
Version	Date	Comments
1.0	Jun 2008	Initial document
2.0	Dec 2009	Initial revisions
2.1	Dec 2009	Add People Management recommendations
2.2	Mar 2010	Reformat to comply with Cuscal’s new policy structure
2.3	Mar 2010	Amendments arising from Executive Review added.
2.4	Apr 2011	Amendments to Approval
2.5	Mar 2014	Reformat; distinguish between use of Grievance policy’ and “Whistleblower policy’ refer to ‘Commonwealth Government Contracts’ requirements and reference `
2.6	Mar 2016	Minor wording updates including change in titles
2.7	Mar 2018	Minor wording changes to align with Group RAS
2.8	June 2018	Substantial updates to reflect Whistleblower protection bill which provides additional legislative protection where an eligible disclosure.

# 1 Introduction

## 1.1 Purpose of this Document

Cuscal is committed to detect and eliminate corrupt, illegal or other misconduct in Cuscal and as such, is necessary in maintaining good corporate governance.

This policy relates to the protection of those “speaking-up” about corporate misconduct and how Cuscal records and actions reported misconduct. The overarching intent of this Policy is to stem misconduct involving our business and to ensure that if misconduct is identified, it is swiftly reported internally so it can be investigated and effectively addressed.

Cuscal relies upon employees, contractors, affiliates, volunteers and suppliers reporting any misconduct suspected or observed so it can be carefully investigated by Cuscal and so those found to be in breach of laws or Cuscal Policy, can be reprimanded, penalised, dismissed or reported to law enforcement for potential prosecution, depending on the nature and seriousness of the misconduct.

An effective whistleblower program can result in:

- An ethical culture and more effective compliance with relevant laws;
- more efficient fiscal management of the entity through, for example, the reporting of waste and improper tendering practices;
- a healthier and safer work environment through the reporting of unsafe practices;
- more effective management;
- improved morale within Cuscal; and
- an enhanced perception, and the reality, that Cuscal is taking its governance obligations seriously.
- Demonstrate the alignment of the Whistleblower Policy with the Grievance Policy and other key policies and legislative requirements.

## 1.2 Context

Cuscal’s vision is to be the place leading businesses turn to for winning payments systems, services and insights.

As an Authorised Deposit-Taking Institution and a major payments processor, Cuscal is subject to a large number of regulatory and legal requirements. Compliance with these regulations is crucial to maintaining a reputation as a trusted partner to its clients.

Cuscal has no tolerance for breaches of legislation or compliance obligations, including acts of intentional non-compliance or deliberate delay of remedial actions. Whilst acknowledging that some minor non-compliance with legislative and compliance obligations will occur, these events will be infrequent in nature and will require immediate remediation plans.

Cuscal actively encourages the disclosure of actual or potential non-compliance and maintains principles of confidentiality and the presumption of innocence. Disclosing persons are appropriately protected from any adverse reaction where the disclosure has been done on reasonable grounds.

### 1.3 Risk Culture

Cuscal aspires to have a risk culture where:

- Compliance with regulatory and legislative obligations is treated with the highest importance
- Employees are encouraged to 'call out' any observed mismanagement of risks by others and communicate them promptly and without fear or favour
- The raising and discussion of risks and controls is BAU for every part of our business; and
- Remuneration structures are aligned with prudent risk taking, which supports Cuscal risk management framework.

### 1.4 Definitions

Under Australian law, **Whistleblowing** is defined as the deliberate voluntary disclosure of individual or organisation's malpractice by a person who has or had privileged access to data, event or information about an actual, suspected or anticipated wrongdoing within or by an organisation that is within its ability to control. More simply, for the purpose of this Policy, Whistleblowing means the voluntary disclosure of information regarding suspected or witnessed corporate **misconduct**, unlawful acts, breaches of internal controls, mishandling of conflicts of interest or abuses of decision-making authority or power over resources or benefits perpetrated by employees, Executives, Directors, contractors, volunteers and affiliates that contravene laws or Cuscal Policies and procedures.

**Misconduct** - For the purpose of this Policy, misconduct or improper conduct is a broad term that can include:

- Corrupt, fraudulent or other illegal conduct or activity;
- Conduct that is contrary to, or a breach of any Cuscal policy or our code of conduct;

- A substantial mismanagement of Company resources;
- Conduct involving substantial risk to health or safety as well as to the environment
- Conduct involving substantial risk to Cuscal's reputation or value;
- Coercion, manipulation, threat or inducements offered to compel someone affiliated with Cuscal to perform any of the acts listed above; or
- Any other serious workplace misconduct considered inappropriate for a Cuscal officer, employee, contractor or volunteer to be engaged in.

that would, if proven, constitute:

- A criminal offence;
- Reasonable grounds for dismissing or otherwise terminating the services of the officer, employee, contractor, volunteer, affiliate or supplier engaged in that conduct; or
- Reasonable grounds for disciplinary action.

Cuscal staff, contractors, affiliates, third parties and volunteers are able to raise **grievances** through People & Culture as per the Grievance Policy. This can relate to a grievance, complaint or concern about something that has happened to the person, or around them, in the workplace. If staff, contractors, affiliates, third parties and volunteers consider that the issue is more than a grievance and that it may involve **misconduct**, then they should follow this Whistleblower Policy

## 1.5 Reporting misconduct - overview

Those who suspect or witness misconduct should be able to report their suspicions with the confidence that they will not be punished or discriminated as a result of doing so, and that if they choose to make a disclosure, that their identity will remain confidential and not disclosed to others unless the whistleblower authorises (gives express consent) for their identity to be shared. Reasonable grounds should exist for making any whistleblower disclosure. A whistleblower does not need to supply evidence of their concerns. Evidence may be gathered as part of a subsequent investigation by Cuscal if required.

Anyone implicated in a misconduct disclosure will be treated fairly and the matter investigated carefully to ensure suspicions that may turn out to be unsubstantiated or wrongly attributed do not cause harm to innocent parties.

## 1.6 Link with other organisational policies

This document should be read in conjunction with the following Cuscal internal policies:

- Fraud and Corruption Policy
- Privacy Policy
- Information Security Policy
- Operational Risk Management
- Code of Conduct.

## 2 Roles and Responsibilities

### 2.1 Accountability - to report misconduct

All Cuscal employees, officers, contractors, suppliers, affiliates and volunteers have a legal obligation to:

- Uphold Australian laws
- Comply with Cuscal policies and procedures as part of their contractual relationship with Cuscal

In our business culture, those obligations bring with them responsibility to also report any suspicion or observed breach of Commonwealth law, misconduct or action that represents a danger to the public, as well as breaches of our Company policies.

### 2.2 Accountability - to protect whistleblowers making disclosures

Cuscal is a regulated entity for the purpose of the Treasury Laws Amendment (enhancing Whistleblower Protections) ACT 2019 by virtue of its status as a company and ADI.

As a regulated entity our organisation and all employees, officers, volunteers and affiliates have an obligation to protect **eligible whistleblowers** that make disclosures about matters eligible for protection (otherwise known as **disclosable matters**).

Whilst the law offers protection for whistleblowers if specific elements are present, our intention is to stem misconduct and encourage confidential disclosures of any corporate misconduct internally. For this reason we are applying the Policy where possible to cover all whistleblowing regarding corporate misconduct, understanding legislative protection only applies to eligible disclosures – refer “Protection” in Appendix 1.

It is an offence to reveal the identity of a whistleblower without the whistleblower’s consent.

When a whistleblower has not given expressed consent to have their identity known, Cuscal

- Must keep confidential the identity of anyone suspected or known to have made a whistleblowing disclosure
- Must ensure the whistleblowers that have come forward and those implicated in the disclosures are never subject to detrimental or adverse treatment as a result of reporting misconduct.

### 2.3 Whistleblowers implicated in the acts they disclose

Despite the protections outlines above, the act of whistleblowing should not shield whistleblowers from the reasonable consequences flowing from any involvement they may have had in the improper conduct being reported or disclosed.

A person's liability for his or her own conduct is not affected by the person's disclosure of that conduct. However in some circumstances, an admission may be a mitigating factor when considering disciplinary action.

## 3 Accountabilities

### Three Lines of Defence

Cuscal implements its Risk Management Framework in accordance with the Three Lines of Defence approach to risk management:

- First line of defence: Management and control system
- Second line of defence: Independent Risk Management
- Third line of defence: Internal Audit

The accountabilities herein are based on the three lines of defence

### Board of Directors

The Board of Directors is the owner of Cuscal's compliance requirements. At each of its meetings the Board of Directors will be advised of any reported misconduct, maintaining the anonymity and protection of both the whistleblower and reported person.

The Chairman of the Board will review the appointment of the Disclosure Officer (DO) where the Reported Person is the Managing Director or other Cuscal officer (eg director, secretary).

## Board Governance and Remuneration Committee

The Board Governance and Remuneration Committee ("BGRC") is responsible for assuring that Cuscal has an appropriate Whistleblower Policy. When any misconduct is raised, the BGRC will monitor adherence to this Policy and deal with any objections made by the whistleblower, including protection and determination of the Reported Conduct. The BGRC will also oversee any changes to the available whistleblower reporting tools.

## Executive Risk and Compliance Committee (ERCo)

ERCo is a management committee comprising Cuscal's Leadership Team, facilitated by the risk team. Specifically in relation to the Whistleblower Policy, ERCo:

- Ensures adherence to this policy in the event in respect of misconduct, taking into account where a member of the ERCo is a Reported Person;
- Ensures the Disclosure Officer is provided with appropriate resources as are reasonable to complete the investigation;
- Ensures confidentiality of communication and documentation in respect of the misconduct, whistleblower and Reported Person;
- In consultation with Legal counsel ensure legislative protection is implemented for any eligible disclosure
- Reviews the result of the investigation and recommend appropriate action including disclosure to ASIC, APRA and/or Federal Police as appropriate; and
- Periodically reviews the Whistleblower Policy to ensure it is fit for purpose.

The Managing Director is responsible for making a determination following the result of the investigation.

## Risk Management Team –

Risk Management will ensure there is training and advice in relation to this Policy as well as ensuring Cuscal maintains appropriate **anonymous reporting channels** for reporting any misconduct.

## Disclosure Recipients

Document all disclosures received consistently, ensuring confidentiality of potential whistleblowing disclosures and maintaining the secure storage of any misconduct disclosures received manually.

### Eligible Recipient (Disclosure Officer)

Eligible recipients also known as Disclosure Officers will confidentially and securely capture and action disclosures.

Cuscal must enable and make available to the Disclosure Officer such resources (e.g. internal such as People Management, Legal etc) as are reasonable in order to enable the DO to action and investigate the disclosure. The DO may seek an external investigator to assist with the investigation, where there are technical, subject matter expertise required.

### Whistleblower Wellbeing Officer (WVO)

Cuscal's WVO will be the GM Shared Services unless the Reportable Conduct relates to that person, in which case the WVO will be a GM not linked to the Reportable Conduct. The WVO will periodically initiate follow up meetings with each whistleblower to monitor whistleblower wellbeing as well as receive and co-ordinate action in respect of report of adverse treatment.

### Internal Audit

Internal Audit will independently assess the key risks and controls in accordance with the yearly audit plan agreed with the Board Audit Committee.

### Suppliers, Officers, Contractors, Volunteers and Employees (Past and present)

Should remain vigilant ensuring those around them are consistently meeting legal and policy obligations and report any suspected misconduct promptly.

## 4 Whistleblowing Framework

### 4.1 Reporting Conduct

Cuscal's designated **disclosure officers** are any of our Leadership Team (apart from the GM Shared services who is our Whistleblower Wellbeing Officer) who are authorised and trained to ensure whistleblower protections are maintained and can assist the whistleblower in making a protected disclosure correctly.

Where a whistleblower makes a disclosure to someone else in the organisation, they should either refer them to the above designated officers or if the whistleblower has expressly requested to remain anonymous they should report the matter using the Cuscal Ethical Disclosure Alert (**CEDA**) maintained by Deloitte. Anonymous reporting can also be made using the whistleblower form on iRisk (Cuscal's risk and compliance system). Further details can be found at **Appendix 1**.

There should be no influence applied over the whistleblower's views or intentions when referring them.

## 4.2 Whistleblower Protection

A **Disclosing Person**, who discloses misconduct, acting on reasonable grounds, must be assured by Cuscal that the disclosure of Reportable Conduct, irrespective of the outcome of any investigation, will not bring about any **adverse treatment or detriment**, by the company, any employee, manager or Director of the organisation. In addition, the Reported Person will be afforded the presumption of innocence during the investigation and until a determination is made.

A Disclosing Person will not be:

- (i) Dismissed;
- (ii) Demoted;
- (iii) Suffer any form of harassment;
- (iv) Discriminated against; or
- (v) Suffer any bias

because they disclosed a Reportable Conduct.

Any breach of this Policy by a Cuscal officer or employee is in itself Reportable Conduct.

## 4.3 Disclosure of Reportable Conduct Confidentiality

Strict confidentiality during any investigation will be required to eliminate any capacity for Reportable Conduct later determined to be unfounded to damage or impugn the reputation or standing of the Reported Person.

The identity of the Disclosing Person, must remain confidential, if disclosed.

A Disclosing Person may, if they wish, remain anonymous and make disclosure of a Reportable Conduct anonymously. Cuscal, if appropriate, may keep the Disclosing Person informed of the nature of the investigation and any progress of the matter but under no circumstances are any specific terms of the investigation, its conclusion or any remedial action taken by Cuscal to be disclosed. An anonymous Disclosing Person cannot be kept informed for obvious reasons.

Unless the Disclosing Person specifically expresses a view that they are not interested in the outcome of the investigation or redress of the issue, Cuscal, subject to any confidentiality obligations, undertakes to communicate and advise the Disclosing Person of the outcome of the investigation and the resulting determination made by Cuscal.

#### 4.4 False or Malicious Disclosure

The protection afforded to a Disclosing Person of a Reportable Conduct does not extend to disclosure that the Disclosing Person knew was false, malicious, or vexatious (eg scandalous or made in bad faith with an intention to injure Cuscal and/or another employee of Cuscal).

Such conduct is in itself a breach of the Disclosing Person's duty to Cuscal and may result in disciplinary action.

#### 4.5 Investigation

Cuscal undertakes to conduct the investigation promptly and with the level of transparency and sensitivity as the circumstances of the issue permit. The investigation of Reportable Conduct will be pursued the same way irrespective of whether a senior or junior staff member carried out the misconduct.

Each employee of Cuscal has the duty to co-operate with the Disclosing Officer (DO) with the investigation. Should a Reported Person choose not to co-operate, on the basis of legal advice or otherwise, the investigation will continue, but the fact that the whistleblower did not co-operate will not be a relevant factor in the determination of the misconduct. Should a Reported Person choose not to co-operate, they may lose the opportunity to contribute to the investigation.

The Reported Person must be given the opportunity to seek external legal or other representation so that the investigation and determination process is impartial, with the view to objectively completing the investigation stage. Such external assistance will be undertaken in accordance with Cuscal's Constitution and Officer's Indemnity and Insurance. Disclosure of information to a legal practitioner for the purpose of obtaining legal advice or representation also qualifies for protection.

The DO must report their finding to the Managing Director in strict confidence, omitting the identity of the Disclosing Person.

#### 4.6 Determination and Review

The Managing Director, in consultation with the relevant expertise in Cuscal, is responsible for making a determination.

The Whistleblower has the right to request that the determination be reviewed by the Board Chairman. No action against the Reported Person can be initiated until the determination has been confirmed.

At the conclusion of the investigation by the DO and implementation of any remedial action, the Managing Director must determine when the matter can be closed.

## 5 Record Keeping & Access to Policy

### 5.1 Record Keeping

The records of the DO must be maintained under strict confidence for a period **not exceeding 7 years from the disclosure date.**

If the misconduct results in a breach of Corporate Legislation, Cuscal's Legal Counsel must determine whether such a breach warrants recording in the Corporate Register required under Cuscal's AFS License and reporting to the Enterprise Risk and Compliance Committee (subject to consideration of the confidentiality of the relevant information).

### 5.2 Policy Access

A copy of this policy is accessible to all employees, officers/Directors, affiliates, suppliers and relatives, dependants and spouses of those parties and the communities in which we operate at all times via a link on our internal and corporate websites.

### 5.3 Breaches of this Policy

Any breach of this policy should be reported to the CRO or Legal Counsel. Failure to adhere to this Policy or to follow instructions issued by the relevant DO or WWO will be considered as a failure by the relevant employee to follow reasonable directions by the employer. Such a failure is a violation of the employee's duty and employment contract and may result in disciplinary action against that employee, which could lead to dismissal.

### 5.4 Potential Fines

In addition to potential disciplinary action, Australian legislation includes penalties that apply to persons who fail to maintain whistleblower protections. As an indicator of penalties associated with whistleblower protections, failure to maintain the confidentiality of the identity of a person known to have made a whistleblowing disclosure can trigger penalties up to \$1M for an individual and \$10M in the case of an organisational failure.

Individual liability/fines will remain the responsibility of the employee and will not be paid by Cuscal.

## 5.5 Consequences for knowingly making false or vexatious reports

Whistleblowers are expected to have reasonable grounds for the claims made in their disclosures. Employees found to have knowingly made a false disclosure may be subject to disciplinary action.

## 5.6 Managing Expectations about responses to disclosures to Regulators

If a whistleblower has made a disclosure to Australian Regulators, ASIC, APRA or a Commonwealth authority prescribed by legislation and that whistleblower is dissatisfied with progress made by the company in relation to the disclosure, they are also entitled to escalate that disclosure (known as an **Emergency Disclosure**) to a member of Parliament or a journalist if ninety days has passed since the disclosure was made and the **discloser** has reasonable grounds to believe there is imminent risk of serious harm or danger to the public health or safety, or to the financial system.

## APPENDIX 1 – Key Definitions

Term	Definition
Adverse treatment or detriment	Adverse action includes: <ul style="list-style-type: none"> <li>• Firing an employee</li> <li>• Injuring the employee in their employment eg not giving them an employee legal entitlement such as pay or leave</li> <li>• Offering a potential employee different (and unfair) terms and conditions for the job, compared to other employees</li> <li>• Discriminating between employees to the disadvantage of a whistleblower</li> <li>• Harassment or intimidation of a person</li> <li>• Harm or injury to a person including psychological harm</li> <li>• Not hiring someone because they have been a whistleblower</li> <li>• Damage to a person's property, reputation, business or financial position; or</li> <li>• Any other harm to a person</li> </ul>
Anonymous disclosure	A disclosure where the whistleblower indicates at the outset of making a disclosure or immediately after, that they wish to remain anonymous to everyone other than the person (or entity) that took their initial disclosure – if that party could identify them at the time or not
Anonymous Reporting channels	To remain anonymous, a disclosure can use a web-based reporting system chosen by Cuscal, known as CEDA (Cuscal Ethical Disclosure Alert) which may be found at <a href="http://www.cuscal.ceda.deloitte.com.au">www.cuscal.ceda.deloitte.com.au</a> . This system enables disclosure of Reportable Conduct to be made by the Disclosing Person directly to an external body for action.  Cuscal staff also have the additional option to use the iRisk (Cuscal risk and compliance system) Whistleblower form available on Central.

	Unless the Disclosing Person elects to identify themselves, the reporting of Reportable Conduct can be done anonymously.
Associate	"Associate" under the Corporations Act, means if the primary person is a body corporate, the associate reference includes a reference to a (a) director or secretary of the body (b) a related body corporate and (c) a director or secretary of a related body corporate.
Claimant	The claimant is the person in a proceeding who is seeking compensation from another person or an organization
Confidential Information	Confidential information in relation to the Whistleblower Amendment Bill includes information containing the identity of the discloser and the information that is likely to lead to the identification of the discloser  Confidential information also includes information that the first person obtained directly or indirectly because of the qualifying disclosure. For example, identifying the information that could be readily deduced from the whistleblowing disclosure
Discloser (AKA whistleblower)	The discloser is the person who discloses information – another term for a whistleblower. They can be: (a) An officer of Cuscal (b) An employee of Cuscal (c) An individual who supplies services or goods to Cuscal (whether paid or unpaid) (d) An employee of a person that supplies services or goods to Cuscal (e) An individual who is an associate of Cuscal (f) A relative of an individual referred to in (a) to (e) (g) a dependent of an individual referred to in (a) to (e) or an individual's spouse
Disclosure	A whistleblowing statement. It can be offered by a whistleblower orally (face-to-face or over the phone or VOIP) or in writing (via mail, email) containing details relating to misconduct either suspected or witnessed.  After the disclosure is reviewed it is typically converted to a report for action by the organisation.
Eligible disclosure	Are disclosures which specifically qualify whistleblowers for protection under the law. These are matters deemed serious enough to potentially expose whistleblowers to risk unless their identity and treatment after whistleblowing is protected. Such matters are referred to as <b>protected disclosures</b> under Australian law. Matters of this nature include the following <ul style="list-style-type: none"> <li>• Information that the whistleblower or disclosure has reasonable grounds to suspect concerns of misconduct</li> <li>• Information relating to a contravention of the Corporations Act, ASIC act, Banking Act, Financial Sector (Collection of Data) Act, Insurance Act, Life Insurance Act, National Consumer Credit Protection Act, Superannuation (Supervision) Act and the Taxation Administration Act</li> <li>• Information regarding an offence against any other Law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more</li> </ul>

	<ul style="list-style-type: none"> <li>Information that represents a danger to the public of the financial system</li> </ul>
Eligible recipient (Disclosure Officers)	<p>Whistleblowing disclosures are eligible for legal protection if they are made to an eligible recipient.</p> <p>Inside Cuscal, eligible recipients are also known as disclosure officers nominated and trained by Cuscal to confidentially and securely capture and action disclosures.</p> <p>Under Australian law, other recipients which are eligible to confidentially and securely capture disclosures and refer them to Cuscal's disclosure officers include ASIC, APRA, AFP or a person/body prescribed for such purposes such as an auditor.</p>
Procedural fairness	<p>Procedural fairness is a standard that requires that a fair and proper procedure has been used when making a decision. It typically involves ensuring there has been an opportunity to be heard, no bias applied and decisions are based on fact.</p>
Protection	<p>To qualify for protection, the discloser (or whistleblower) has to be or has been an "eligible" whistleblower" in relation to a whistleblower regulate entity and the disclosure must be made to an eligible recipient.</p> <p>Information eligible for protected disclosure includes:</p> <ul style="list-style-type: none"> <li>Information that the whistleblower or discloser has reasonable grounds to suspect concerns misconduct</li> <li>Information relating to an offence or contravention of the Corporations Act, ASIC act, Banking Act, Financial Sector (Collection of Data) Act, Insurance Act, Life Insurance Act, National Consumer Credit Protection Act, Superannuation (Supervision) Act and the Taxation Administration Act</li> <li>Information regarding an offence against any other Law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more</li> <li>Information that represents a danger to the public or the financial system</li> </ul> <p>Once disclosures are eligible for protection, protections include:</p> <ul style="list-style-type: none"> <li>Rights to compensation</li> <li>Names of the discloser or victim cannot be published by courts</li> <li>Identifying information cannot be disclosed to courts or tribunals if the discloser qualifies for protection</li> <li>Confidentiality of the whistleblower's identity</li> <li>they may not be subject to civil, criminal or administrative liability</li> </ul>
Reported Person	<p>The individual(s) whom are alleged as to have made the misconduct by the whistleblower and is subject to an investigation.</p>