

SAI GLOBAL WHISTLEBLOWER POLICY

1. INTRODUCTION

SAI Global Pty Limited and its controlled entities (SAI Global Global) are committed to operating at the highest ethical and legal standards.

The Board of Directors and management of SAI Global Pty Limited recognize that upholding these standards requires confidence on the part of all staff, contractors and suppliers that issues of concern can be raised and addressed with confidence.

It is the responsibility of each SAI Global employee to understand and abide by the company's Code of Business Conduct. When Code violations are known, it is the employee's duty to take the appropriate action. Such action may differ slightly depending on the local laws. Employees will not be retaliated against for making reports of wrongdoing. Such reports may be made to a direct supervisor, to the Chief Risk Officer, to the Group Director, Human Resources, or through the ComplianceLine anonymous and confidential process described herein.

This Whistleblower Policy forms an integral part of SAI Global's commitment towards providing a safe and ethical work environment, and meeting its obligations to its stakeholders, the community and the environment.

The Board of Directors of SAI Global Pty Limited provides oversight of this Policy.

2. GOALS, PURPOSE AND BENEFITS

This Policy aims to:

- foster a culture of compliance and responsible & ethical decision making at SAI Global
- describe the process for making and investigating disclosures described in section 3.2
- give staff, contractors and suppliers confidence to make such disclosures
- ensure that no one will be victimised or suffer retribution because of a disclosure made in connection with this Policy
- ensure fairness for all parties, including the subject of the complaint.

3. HOW THE POLICY WORKS

3.1 Who can make a report?

Any employee of SAI Global of any rank or employment status, any contractor working for or with SAI Global, or any supplier of goods or services to SAI Global (collectively referred to in this Policy as "you") may make a disclosure. Customers are encouraged to provide feedback through client service managers and focused surveys. All reports made in good faith by interested parties will be taken seriously.

3.2 When to make a report?

You are encouraged to make a disclosure of any actions or behaviour you genuinely believe may be:

- dishonest
- fraudulent
- corrupt
- illegal
- bullying or harassing
- represent a serious conflict of interest
- involve a misuse of sensitive or confidential information
- a miscarriage or denial, or likelihood thereof, of natural justice
- a violation of SAI Global's Code of Business Conduct.

3.3 What is expected when making a report?

Generally, you are encouraged to make a report as early as possible. SAI Global does not expect that you will be an expert on the law nor should you conduct your own investigation. However, all reports must be made in good faith. Whether you raise an issue directly with your supervisor or submit a report via the ComplianceLine helpline as outlined below, you will be expected to disclose relevant facts about the situation to aid management in taking appropriate action.

3.4 How to make a report

It is ideal to raise your concern with your immediate supervisor or contact at SAI Global on an identified basis. Our policy is to treat every submission with respect, to honour requests for confidentiality, and not to retaliate against submitters. We understand that for a variety of reasons employees may choose to use one of the alternate means of making a report as described below.

- Call the Chief Risk Officer at +61 2 8206 6994
- Make a web submission at:
www.mycompliancereport.com, and enter access ID: SAI
- Contact the ComplianceLine service via telephone – numbers are provided at the end of this document.

The ComplianceLine call centre activities are outsourced, meaning that your call will be answered by Risk Specialists at a call centre in the Midwest US; they are not SAI Global employees. The Risk Specialists are available every minute of every day of the year to take your call. You will be treated with respect, put at ease, and asked questions such as you would expect any investigator to pursue.

The MyComplianceReport web submission site is accessible in several languages, and is very easy and quick to use.

Whether you use the phone or the web, you may remain anonymous and confidential, or you may choose to identify yourself to facilitate the investigation process. No caller IDs or computer IP addresses are captured. If you elect anonymity, the company will not attempt to learn your identity. There are extenuating circumstances in every country's laws which could require SAI Global to identify a submitter, but these are the exception based on helpline experience.

The ComplianceLine submitter receives a case number which uniquely identifies the case and a call back date. This case number is used to anonymously (if selected) follow up, and facilitates a confidential dialog between the submitter and management. For example, after a caller or a web user submits a report, he or she may call back or visit the submission website on or after the call back date, supply the case number, and receive management's response. In the response, management may ask additional questions, the answers to which will aid in resolving the issue. The management response may also provide expectations for what will happen next or simply express appreciation for speaking up.

The Board of Directors of SAI Global Pty Limited will oversee the process of handling all reports, and will be regularly apprised of investigations and other actions taken pursuant to this Policy.

3.5 What to expect in making a report

Whether you choose to speak out on an identified basis, contact the Chief Risk Officer directly, or use the ComplianceLine reporting helpline, your report will be taken seriously.

All issues are logged into a tracking system and monitored by the Chief Risk Officer. Handling of the issue will be delegated to one of a small group of designated managers at SAI Global depending on the nature of the issue. For example, issues relating to a hostile work environment might be passed to the Group Director of Human Resources for investigation and handling.

3.6 What happens after I make a report?

If your report is made directly to your supervisor or someone else within the organization, it will be entered into a case tracking system. If your report is made using the ComplianceLine helpline, the report will be automatically logged into the same case tracking system and the Chief Risk Officer or designated personnel will be notified that a new report has been received. The Chief Risk Officer or designee will access the case tracking system, read the case, and may choose to handle the issue immediately, or may involve others among a small group of designated managers at SAI Global to investigate and handle the issue. Such a group is a "review team."

The review team will decide whether to commence an investigation into the disclosure. The review team may seek further information from the submitter or other persons in the course of the investigation but must remember at all times the importance of protecting the identity of whistleblowers who request anonymity.

The outcome of an investigation will depend on the nature of the disclosure and could involve liaison with external investigators or subject matter experts. In extreme circumstances, the police, corporate regulators or industry accreditation bodies may be brought in.

4. PROTECTION OF WHISTLEBLOWERS

Maintaining the confidentiality of a whistleblower who elects anonymity is paramount. SAI Global and its personnel, including each of the review team involved in investigating a disclosure or dealing with a whistleblower will do everything reasonably possible to ensure that this person's identity will remain confidential and will not be disclosed unless required by law.

Where, because of the nature of the disclosure, or because of cooperation with law enforcement authorities, it is not possible to maintain a whistleblower's confidentiality, the review team will inform the whistleblower as soon as possible and work with them to minimise the impact of the loss of confidentiality.

The assistance SAI Global may be able to provide to the whistleblower includes:

- a leave of absence
- relocation to another role or office whilst maintaining pay and seniority
- provision of counselling services.

4.1 Commitment to keep the whistleblower informed

The Chief Risk Officer or the review team will provide regular feedback to a whistleblower concerning the progress of the investigation and any action taken in relation to his or her disclosure.

4.2 No recriminations against whistleblowers

Whistleblowers will not suffer recriminations as a result of their disclosure. Some examples of recrimination include:

- loss of job
- physical or psychological abuse or threats
- demotion of role, pay or entitlements
- current or future bias within the company
- loss or risk of loss of contracts or business with SAI Global

SAI Global cannot provide immunity from any civil or criminal legal liability resulting from the actions of a person making a disclosure under this Policy.

4.3 Consequences of misusing the reporting process

The effectiveness of this Policy rests on the good faith and high ethical standards from all stakeholders. Any disclosure must be made in good faith. Any person found to have made a disclosure with the deliberate, malicious intent of harming another person or organisation may lose benefits available under this Policy or be subject to disciplinary or legal action.

5. COMPLIANCE WITH LOCAL LAWS

SAI Global will comply with local laws in the conduct of this Policy.

6. REVIEW PROGRAM

SAI Global will review the operation of the Policy periodically to ensure that it meets its goals and remains effective.

Administration of this policy

This policy is approved by the SAI Global Board.

Revision Date: August 2017

COMPLIANCELINE PHONE NUMBERS

Country	Number
Australia	1800-987-636
Canada	1-800-565-0610
China	400-120-9077
Czech Republic	Dial 00-800-222-55288 (access code). Wait for the dial tone/prompt. Dial the toll-free number 1-800-565-0610.
Germany	0800-182-4524
Indonesia – Indostal	001-803-015-204-0053
Indonesia – PT Telkom	007-803-011-4437
Ireland	353-766805105
Italy	800-787-115
Japan	0800-919-5833
Mexico	18000831038
New Zealand	0800-452598
Poland	00-800-111-3997
Russia	Dial 8 ^ 10-800-110-1011 (access code). Wait for the dial tone/prompt. Dial the toll-free number 1-800-565-0610. From Moscow or St. Petersburg, Dial 363-2400 (access code). Wait for the dial tone/prompt. Dial the toll-free number 1-800-565-0610. From outside Moscow, Dial 8 ^ 495-363-2400 (access code). Wait for the dial tone/prompt. Dial the toll-free number 1-800-565-0610. From outside St. Petersburg, Dial 8 ^ 812-363-2400 (access code). Wait for the dial tone/prompt. Dial the toll-free number 1-800-565-0610.
South Africa	0800-983-583
South Korea	080-808-0622
Thailand	00-1800-132-040-052
United Kingdom	0800-032-5546
USA	1-800-565-0610

COMPLIANCELINE WEBSITE

www.mycompliancereport.com and enter access ID: SAI