



Speak Up Policy 畅所欲言政策

1 What is the purpose of this Policy?

1 政策目的

At Super Retail Group Limited (**Company**), one of our core values is ‘We speak up’. Speaking up is an important part of our culture, embedded in our values, and we are committed to creating and maintaining a safe to Speak Up culture.

“敢于直言”不当行为是超品集团有限公司（以下简称“公司”）的核心价值观之一。举报不当行为是公司文化的重要组成部分，亦是公司价值观的彰显。我们矢志创建并维系安全的、“敢于直言”的企业环境。

The Company and its wholly owned subsidiary companies (**Group**) are committed to conducting business honestly, with integrity, and in accordance with its values and standards of expected behaviour.

公司及其全资子公司（以下合称“集团”）致力于秉持诚信、正直的原则，按照各自的价值观和行为标准开展业务。

The Board of Directors of the Company has approved this Policy to operate for the Group in order to:

公司的董事会已批准在集团内实施本政策，旨在实现以下目的：

- encourage people to Speak Up if they become aware of Potential Misconduct;
鼓励员工察觉潜在不当行为时，予以举报；
- help deter wrongdoing, in line with the Group’s risk management and governance framework;
帮助集团按照集团风险管理和治理体系，防范遏制不当行为；
- explain how to Speak Up and what protections a Discloser will receive;
阐述提出举报的方式以及举报者可获得的保护；
- support the Group’s values and Code of Conduct;
支持集团的价值观和《员工守则》；
- outline the Group’s processes for responding to Speak Up reports; and
阐述集团的举报处理流程；及
- promote a workplace environment in which everyone feels safe, supported and encouraged to Speak Up.
营造让员工感到受保护、支持和鼓励的工作环境，让员工说出真实顾虑。

A failure to Speak Up exposes the Group to additional risks and will undermine our culture and values.

举报有助于避免集团面临额外的风险以及集团文化与价值观免受破坏。

The Board will not tolerate anyone being discouraged from Speaking Up or being subject to detriment because they want to Speak Up or they have done so. Disciplinary action, up to and including termination of employment or engagement, may be imposed on anyone shown to have disadvantaged, victimised or otherwise caused detriment to a person because they want to, or have, spoken up.

董事会绝不容忍劝阻任何人进行举报或因为任何人打算或已经进行举报而对其进行伤害的行为。如果有证据证明任何人已损害、伤害或以其他方式侵害打算或已经进行举报之人的，可能会导致纪律处分，甚至会导致雇佣或委托关系的终止。

While the Company encourages all team members to Speak Up about a range of matters, the scope of this Policy is limited to protected Disclosures.

尽管公司鼓励全体团队成员对各种不当行为予以举报，但本政策仅适用于受保护的披露。

2 What is Speaking Up?

2 举报的定义

Speaking Up means telling an appropriate person in a position of influence (examples of these people, called **Recipients**, are provided in section 5 below) if you have reasonable grounds to suspect that Potential Misconduct has occurred or is occurring in relation to the Group, this is called a **Disclosure**.

举报指在您有合理依据怀疑已经发生或正在发生涉及集团的潜在不当行为之时，将该等潜在不当行为上报处于有影响力职位的人员（详见下文第5条，以下统称为“接收者”）的过程，此即为“披露”。

If you are an eligible whistleblower, called a **Discloser**, and you report Potential Misconduct to an eligible recipient you will qualify for legal protections. Further information is in Attachment 1.

如果您是符合条件的举报者（或“披露者”），当您向符合条件的接收者举报潜在不当行为之时，您将有资格获得法律保护。详见附件1。

In addition to the protections granted under this Speak Up Policy, team members or eligible whistleblowers from New Zealand and China may qualify for further protections. The provisions outlined in Attachment 2, specific to New Zealand and China, may alter the terms and functionality of this Speak Up Policy to accommodate local laws and regulations, and must be reviewed alongside this Speak Up Policy. To the extent of any inconsistency between this Speak Up Policy and the provisions specific to New Zealand and China, the New Zealand or Chinese provisions will prevail.

除本《畅所欲言政策》所赋予的保护外，新西兰和中国的团队成员或符合条件的举报者还可能资格获得其他保护。附件2中针对新西兰和中国的条款可能会根据当地法律法规对本《畅所欲言政策》的条款及功能予以修改，请务必与本《畅所欲言政策》一同阅读。





如本《畅所欲言政策》相关规定与新西兰和中国的具体规定不一致时，应以后者为准。

Anyone with information about Potential Misconduct is encouraged to report that information to a Recipient (i.e. to Speak Up). If in doubt, Speak Up.

集团鼓励任何知晓潜在不当行为之人向接收者反馈该等潜在不当行为（即，举报）。一旦怀疑发生了或可能发生潜在不当行为，请立即举报。

3 What is Potential Misconduct?

3 潜在不当行为的定义

Potential Misconduct is any suspected or actual misconduct or improper state of affairs or circumstances in relation to the Group. This will include conduct in relation to an employee or officer of the Group.

潜在不当行为指与集团相关的任何涉嫌或实际存在的的行为或不当事态或情况，包括与集团员工或高级职员有关的行为。Potential misconduct also means a breach of law or information that indicates a danger to the public or to the financial system. 潜在不当行为还包括危害公众或金融体系的违法行为或信息泄露。

You should Speak Up even if you are unsure if something is Potential Misconduct. 即使您不确定某一行为是否属于潜在不当行为，也应该予以举报。

Potential Misconduct does **not** generally include **personal work-related grievances**.

潜在不当行为一般不包括个人与工作相关的申诉

Personal work-related grievances are grievances about something in relation to your current or former employment or engagement that have implications for you personally (such as a disagreement between you and another employee or a decision about your promotion).

个人与工作相关的申诉指与您目前或以往的雇佣或委托关系有关的、对您个人有影响的申诉（例如，您与其他员工之间的分歧或有关您升职的决定）。

Generally, these grievances should be raised via the Workplace Resolution Policy to allow those issues to be resolved most effectively.

一般而言，此类申诉应按照《职场争议解决政策》予以提出，以便能够最为有效解决问题。

Examples of Potential Misconduct include, but are not limited to: 潜在不当行为包括但不限于：

- breach of laws or regulations; 违反法律或法规；
- criminal activity; 犯罪活动；
- conduct endangering health and safety, or causing damage to the environment; 危害任何个人健康和环境，或破坏环境的行为；
- dishonest, unethical, or corrupt behaviour, including soliciting, accepting or offering a bribe, facilitation payments or other such benefits; 失信、欺诈或腐败行为，包括索贿、受贿或行贿、好处费或其他此类利益；
- conflicts of interest; 利益冲突；
- unauthorised use of the Group's confidential information; 在未经授权的情况下使用集团的保密信息；
- information that indicates a danger to the public or to the financial system; 散布危害公众或金融体系的信息；
- anti-competitive behaviour; 反竞争行为；
- financial fraud or mismanagement; 财务舞弊或管理不善；
- insider trading; 内幕交易；
- breach of trade sanctions or other trade controls; 违反贸易制裁或其他贸易管制；
- modern slavery practices; 现代奴役行为；
- tax-related misconduct; 与税务相关的行为；
- conduct likely to damage the Group's financial position or reputation; and 有可能导致集团财产受损或名誉受损的行为；及
- deliberate concealment of the above. 故意隐瞒上述行为。

While personal grievances will not generally amount to Potential Misconduct, they may be covered by this Policy in certain situations. 个人申诉一般不构成潜在不当行为，但在某些情况下，适用本政策。

For example, a grievance may be covered by this Policy if it: 例如，满足以下条件的个人申诉适用本政策：

- relates to detriment that has been suffered or is threatened because an individual has raised a concern about suspected Potential Misconduct; 涉及因个人提出对疑似潜在不当行为的担忧而遭受损失或受到威胁的；
- relates to both a personal work-related grievance and Potential Misconduct; or 既涉及个人与工作相关的申诉，又涉及潜在不当行为的；或





- relates to concerns that the Group has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or information that suggests misconduct beyond the Discloser's personal circumstances.
涉及集团已存在的违反雇佣或其他法律并可被判处 12 个月或以上有期徒刑的行为、或集团参与危害公众的行为，亦或有证据证明集团存在超出披露者个人可知范围的不当行为的。

In some cases, personal work-related grievances may qualify for legal protection. See Attachment 1 for details.
在某些情况下，个人与工作相关的申诉可能有资格获得法律保护。详见附件 1。

4 Who can Speak Up? 4 有举报资格之人

Anyone with information about Potential Misconduct is encouraged to Speak Up.
集团鼓励任何知晓潜在不当行为之人予以举报。

This Policy applies to:
本政策适用于：

- the Group; and
集团；及
- all of the Group's current and past employees, volunteers, officers, contractors, consultants, suppliers (including employees of suppliers), work experience participants, students on placements, and associates, as well as these people's dependants (or their spouse's dependants) and their relatives.
集团所有的在职与前任员工、志愿者、高级职员、承包商、顾问、供应商（包括供应商员工）、工作体验者、实习学生和关联方，以及上述人士的亲属（或其配偶的家属）与受抚养者。

Please see Attachment 1 for information about protections that may be available to Disclosers under whistleblowing laws in Australia.
关于披露者可依据澳大利亚举报相关的法律可获得的保护，详见附件 1。

5 Who should I tell? 5 接收举报之人

The Company encourages you to Speak Up to one of the following **Recipients** listed in the table below.
公司鼓励您向下表所列任一**接收者**进行举报。

To assist you to Speak Up, the Company has established an Integrity Line. The Integrity Line is an external online reporting service that gives you the opportunity to anonymously report Potential Misconduct in a secure manner. The Integrity Line also allows for two way anonymous communication between you and the Group, and gives you control on the disclosure of your identity. You can contact the Integrity Line via the details set out below.

为方便举报，本公司设立了举报热线。举报热线是一种外部在线举报服务，能够为您提供以匿名方式安全举报潜在不当行为的契机。您也可以通过举报热线与集团进行双向匿名交流，并掌控自身身份的披露情况。您可以按照下列详细信息联系举报热线。

Recipient Name 举报方式	Contact Details 联系详情
Integrity Line 诚信热线	You can contact the Integrity Line as follows: 您可以通过以下方式联系诚信热线： - for matters arising in Australia or New Zealand, by accessing the Whispli platform by visiting https://superretailgroup.whispli.com/IntegrityLine or scanning the QR code below; 对于在澳大利亚或新西兰发生的事宜，请访问 https://superretailgroup.whispli.com/IntegrityLine 或扫描下方二维码使用 Whispli 平台；或  - for matters arising in China, calling +86 21 22206297. 对于在中国发生的事宜，请拨打+86 21 22206297。
Integrity Officers: 诚信官：	You can contact the Integrity Officers by post to: 您可以写信联系： The Integrity Officer (Confidential): 诚信官（保密）： PO Box 344, Strathpine, Queensland, Australia 4500
- Chief Legal Officer 首席法务官 - Chief People and Safety Officer	





首席人事与安全官

Chair of the Board Human
Resources and Remuneration
Committee
董事会人力资源与薪酬
委员会主席

If you feel that your concerns cannot be, or are not, adequately addressed by the Group's Integrity Officers or via the Integrity Line, you may contact the Chair of the Board Human Resources and Remuneration Committee in writing, by post to:
如果您认为集团的诚信官或通过诚信热线无法或未能充分解决您反馈的问题，您可以通过书面形式联系董董事会人力资源与薪酬委员会主席以上报：
The Chair of the Board Human Resources and Remuneration Committee
董事会人力资源与薪酬委员会主席
Integrity Line (Confidential)
诚信热线（保密）
PO Box 344, Strathpine, Queensland, Australia 4500

The role of Recipients is to ensure that the information is heard by the Company and proper follow-up occurs, as well as to ensure that you feel supported and protected. You can make your report to the Recipients by using any of the methods listed above.

接收者的职责在于确保公司听取相关举报信息并采取适当的后续跟进，同时确保您能够获得支持与保护。您可以通过上述任一方式向接收者举报潜在不当行为。

The Group has established the role of Integrity Officer to oversee the appropriate investigation, management and resolution of Potential Misconduct.

集团已任命诚信官，负责监督对所举报的潜在不当行为进行适当的调查、管理及解决。

People must not discourage any individual from Speaking Up and to do so will itself breach this Policy. If any person is told not to raise or pursue a concern, even by their manager or a person in authority, they are encouraged to make a further Disclosure to a different Recipient.

任何人不得劝阻他人举报潜在不当行为，否则即违反本政策。如果您被劝阻不得报告或追究任何问题，即使劝阻的人是您的经理或当权人士，集团仍鼓励您向其他接收者进行进一步的披露。

While we encourage you to Speak Up to one of the Recipients listed in the table above, there are certain other people to whom you can report and still receive the legal protections described in section 11 below, who are listed in Attachment 1.

尽管我们鼓励您向上表所列出的接收者反映问题，但您也可以向附件 1 中所列出的其他人士进行举报，并且您仍可以获得下文第 11 条所述的法律保护。

6 What information should I provide?

6 应提供的信息

You should provide as much information as possible, including details of the Potential Misconduct, people involved, any witnesses to the Potential Misconduct, dates, times and locations, and if any more evidence may exist.

您应提供尽量详尽的信息，包括潜在不当行为的详情、所涉人员、潜在不当行为的目击证人（如有）、潜在不当行为发生的日期、时间和地点，以及可能存在的其他证据（如有）。

You are encouraged to feel supported and safe in providing information, and to consent to the limited sharing of your identity. This will assist the Company to protect and support you in relation to your Disclosure and facilitate the Company in investigating, reporting and taking action arising as a result of your Disclosure.

我们希望您在提供信息时感受到支持与保护，我们也希望您同意我们在有限的范围内披露您的身份信息。这将有助于公司保护您不因披露而受到伤害以及在您披露时向您提供支持，并方便公司调查、报告您所披露的不当行为以及针对该等不当行为采取措施。

Please be aware that if you do not consent to the limited sharing of your identity as needed, this may limit the Company's ability to progress your Disclosure and take any action in respect of your Disclosure.

请知悉，如果您不同意公司必要时在有限的范围内披露您的身份信息，公司处理您所披露的不当行为以及针对该等不当行为采取措施的能力可能会收到限制。

The details of your Disclosure will only be accessible by those involved in the investigation, who will use that information to determine the appropriate response to Disclosures made and to inform any investigation commenced. If any of these people are or may be implicated in your Disclosure, they will not be able to access that information.

公司将仅允许参与调查的人员查阅您所披露的详细信息。该等人员将利用您披露的详细信息确定适当的应对措施，并发布调查启动通知。您披露的信息涉及或可能涉及的调查人员将无法查阅您所披露的信息。

7 What if the information is incorrect?

7 举报信息不实的后果

When Speaking Up you will be expected to have reasonable grounds to believe the information you are disclosing is true, but you will still be protected under this policy even if the information turns out to be incorrect. However, you obviously must not make a report that you know is not





true or is misleading.

提交举报时，您应有合理依据断定您所披露的信息真实无误，但即使最终证实您披露的信息有误，您仍将得到本政策规定的保护。但是，如果您已经知晓您将披露的信息有误或具有误导性，您不得故意披露该等信息。

Where it is found that a person has knowingly made a false report, this may be a breach of the Company's Code of Conduct and will be considered a serious matter that may result in disciplinary action, up to and including termination of employment or engagement. Any such disciplinary action will not be considered detrimental treatment of a person because they have spoken up.

如果公司发现任何个人故意虚假举报潜在不当行为，则可能被视为违反公司的《员工守则》，属于严重事件，可能会导致纪律处分，甚至会导致雇佣或委托关系的终止。任何该等纪律处分均不得视为对举报者因进行举报而受到的不利待遇。

8 Can I make an anonymous report?

8 匿名举报

You can make an anonymous report if you do not want to reveal your identity when reporting Potential Misconduct under this Policy. 如果您根据本政策举报潜在不当行为时，不愿意透露自身身份，您可以选择匿名举报。

The Company encourages the reporting of Potential Misconduct, however we appreciate that Speaking Up can be difficult. 公司鼓励举报潜在不当行为，但我们也理解这并不容易。

We encourage you to provide your name because it will make it easier to investigate and address your report. However, you are not required to do so, and may choose to remain anonymous when making a Disclosure, over the course of the investigation and after the investigation is finalised.

我们鼓励您提供您的姓名，这将有利于我们调查和处理您举报的潜在不当行为。但我们并不会对此向您提出要求。您可以选择在披露时、调查过程中及在调查结束后始终保持匿名。

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

如果您不提供您的姓名，公司将在当时的情况下尽可能地展开调查。公司将按相同的方式评估您披露的信息内容和价值，就如同您已披露您的身份。但在您未充分提供信息的情况下，公司可能难以开展调查。此外，如果公司不知晓您的身份，可能难以向您提供同等程度的实际支持。您仍有权获得适用的法律保护（详见附件1）。

If you do provide your name, it will only be disclosed if you provide your consent, or in exceptional circumstances where the Disclosure is allowed or required by law (e.g. in dealings with a regulator). Details of how your identity will be protected are described in section 11.1 below. If you have concerns about this, you can discuss this with the Recipient.

如果您提供了您的姓名，除经您许可或法律允许或要求披露的特殊情况外（例如，配合监管机构完成监管），公司将不会透露您的姓名。下文第11.1条详述了公司保护您身份信息的方式。如果对此存有顾虑，您可以与接收者进行探讨。

9 How will the Company respond to a report?

9 公司处理举报的方式

All reports made under this Policy will be received and treated sensitively and seriously, and will be dealt with promptly, fairly and objectively. The Company will apply the protections described at section 11 below when responding to Disclosures or investigating Potential Misconduct.

根据本政策提交的所有举报，公司都将以敏感和严格保密的方式严肃接收与对待，并将及时、公正且客观地予以处理。在处理披露或调查潜在不当行为时，公司将采取下文第11条所述的保护措施。

The Company's response to a report will vary depending on the nature of the report and the amount of information provided. Your report may be addressed and resolved informally (such as assisting employees to change their behaviour) or through formal investigation.

公司将根据举报的性质和举报者所提供的信息量对举报作出相应处理。换言之，公司可能通过非正式的方式处理与解决您举报的潜在不当行为（例如，协助相关员工改正其行为），也可能通过正式的调查处理与解决您举报的潜在不当行为。

The Company's response to Disclosures made under this Policy will generally be overseen by the Integrity Officers, subject to any potential conflicts of interests or concerns. Integrity Officers are supported by the Workplace Relations team in the discharge of their obligations under this Policy. If the Disclosure relates to an Integrity Officer or the Chair of the Board Human Resources and Remuneration Committee considers it would be inappropriate, the Chair of the Board Human Resources and Remuneration Committee will oversee the Company's response. Any investigation that occurs will be conducted by people who are objective and independent of the team or business unit concerned in the report, which may include other employees or external advisers.

一般而言，根据本政策所作出的披露由公司诚信官负责监督公司的处理；但如果诚信官与被披露事项存在潜在利益冲突或顾虑，则由其他适当人员负责监督。诚信官履行本政策所规定的义务时，由职场关系小组提供支持。如披露内容涉及诚信官，或董事会人力资源与薪酬委员会主席认为不宜由诚信官负责处理该披露，由董事会人力资源与薪酬委员会主席负责监督公司的处理。所有调查均将由与举报所涉团队或业务部门无关联且处事客观的人员开展，可能包括其他员工或外部顾问。





If appropriate, Disclosers will be told how the Company has decided to respond to their Disclosure, including whether an investigation will be conducted. This may not occur until after an investigation has been concluded. However, it may not always be appropriate to provide Disclosers with this information, and may not be possible unless contact details are provided when Speaking Up.

如有必要，公司将告知披露者公司所决定的处理方式，包括是否会开展调查。在调查结束之前，公司可能不会告知披露者是否开展了调查。但并非在所有情况下都适宜向披露者告知该等信息。此外，如果披露者未在举报时提供详细的联系方式，公司可能无法向披露者告知该等信息。

While Speaking Up does not guarantee a formal investigation, all reports will be properly assessed and considered by the Company and a decision made as to whether they should be formally investigated or internally resolved.

尽管公司不会针对所有举报均开展正式调查，但公司会对适当评估和审议所举报的不当行为，并决定是否应开展正式调查还是内部处理。

Any investigations commenced will be conducted in a timely manner and will be fair and independent from any persons to whom the report relates. Timeframes will vary depending on the particular investigation and will depend on a number of factors, for example, the complexity, the scope of the matter, the number of people to be interviewed, whether expert advice is required etc. However, the Company endeavours to investigate each matter as soon as reasonably practicable after the matter has been reported.

公司将及时完成已启动的调查。所有调查都将公平公正开展，不受举报所涉任何人员的干扰。调查的时间期限因调查的具体情形而异，取决于诸多因素，诸如调查的复杂程度、调查事项的范畴、需要访谈的人数、是否需要专家建议等。公司在收到举报后，会竭尽全力在合理可行的时间内尽快针对举报开展调查。

All employees and contractors must cooperate fully with any investigations.

公司的所有员工和承包商必须全力配合调查。

Unless there are confidentiality or other reasons not to do so, persons to whom a Disclosure relates will be provided with details of the report that involves them at an appropriate time (to the extent permitted by law) and be given an opportunity to respond.

公司将在法律允许的范围内在适宜的时机，向与举报相关的人员提供涉及其举报的详细内容，并给予其回应的机会，但因受保密义务限制或其他原因而无法提供举报内容的情况除外。

10 What happens after an investigation?

10 调查结束后的举措

The results of any investigation will be recorded in writing in a formal internal report that will be confidential and is the property of the Company. The outcome of any investigation will be reported to the Board Human Resources and Remuneration Committee in accordance with section 12 below.

所有调查结果均将以书面形式记录在正式的内部报告中。该等报告归公司所有，属于公司的保密信息。公司将根据下文第 12 条向董事会人力资源与薪酬委员会汇报调查结果。

The formal report recording the results of an investigation will not be provided to a Discloser or any other person subject to or implicated in an investigation.

公司不会向披露者或任何其他被调查人员或受调查牵连人员提供记录调查结果的正式报告。

Where an investigation identifies a breach of the Company's Code of Conduct or internal policies or procedures, by any person employed by SRG, appropriate disciplinary action may be taken. This may include but is not limited to terminating or suspending the employment or engagement of a person(s) involved in any misconduct.

一旦调查结果表明任何集团员工违反公司的《员工守则》或内部政策或程序，公司可对其采取适当的纪律处分，包括但不限于终止或中止其雇佣或委托合同。

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

11 根据本政策举报者可获得的保护

The Company is committed to protecting people who Speak Up under this policy. This section outlines the Company's policy on protecting those who Speak Up. The law also contains protections for Disclosers, which are summarised in Attachment 1.

公司格致力于保护所有依据本政策进行举报的人员。本条阐述了公司对于举报者的相关保护政策。此外，法律也规定了对披露者的保护措施，详见附件 1。

11.1 Protecting your identity

11.1 保护举报者的身份信息免遭泄露

The Company will look to protect the identity of people who Speak Up about Potential Misconduct under this Policy. Your identity (and any information the Company has because of your report that someone could likely use to work out your identity) will only be disclosed if:

公司将保护根据本政策举报潜在不当行为为人员的身份信息。公司将仅在以下情况下披露您的身份信息（以及公司因您的举报而掌握的、可能被他人利用来查明您身份的信息）：

- you give your consent to the Company to disclose that information;
您同意公司披露该信息；





- the Disclosure is allowed or required by law (for example, the disclosure by the Company to a lawyer in order to get legal advice); or 法律允许或要求披露信息（例如，公司为获得法律建议而向律师披露信息）；或
- in the case of information likely to identify you, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out your identity. 就可能识别出您身份的信息而言，出于开展调查的目的而合理需要披露该等信息，但公司会采取一切合理举措防止他人查明您的身份。

The measures which the Company may adopt to protect your identity may include some or all of the following, as appropriate in the circumstances:

公司可根据具体情况酌情采取下列多项或全部措施来保护举报者的身份信息：

- using a pseudonym in place of your name; 使用化名替代举报者的真实姓名；
- communications may be undertaken through anonymous telephone hotlines and anonymised email addresses; 通过匿名热线电话和匿名电子邮箱进行沟通交流；
- redacting personal information or references to you; 隐去举报者的个人信息或与之有关的内容；
- referring to you using gender-neutral language; 使用中性语言提及举报者；
- where possible, consulting with you to help identify the aspects of your Disclosure that could inadvertently identify you; 在可能的情况下，与举报者协商，帮助其确定披露信息中可能无意透露举报者个人身份信息的部分；
- ensuring paper and electronic documents and other materials relating to your Disclosure are stored securely; 确保安全存放与披露有关的纸质和电子文件及其他资料；
- limiting access to all information relating to a Disclosure to those directly involved in managing and investigating the report; 仅限直接参与管理和调查举报事项的人员获取与披露相关的所有信息；
- use of equipment and correspondence (such as printers or email addresses) that can only be accessed by appropriate persons; 使用仅限适当人员才能使用的设备和通信方式（例如，打印机或电子邮箱）；
- only disclosing your identity or information that is likely to lead to your identification to a restricted number of people who are directly involved in handling and investigating the Disclosure; and 仅向少数直接参与处理和调查披露事项的人员披露举报者的身份信息或可能致使披露者身份被识别的信息；及
- reminding each person who is involved in handling and investigating a Disclosure about the confidentiality requirements, including the consequences of an unauthorised Disclosure. 提醒每一位参与处理和调查披露事项的人员遵守相关保密要求，包括在未经授权的情况下披露的后果。

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

如果您因举报而满足附件 1 所规定的受法律保护的条件，公司将依法保护您的身份信息及可能致使他人识别您身份的其他信息。如果有人人在未经授权的情况下披露您的身份信息，这可能构成违法，您有权寻求法律途径予以解决。在某些情况下，这还可能构成刑事犯罪。

11.2 Protecting you from detriment

11.2 保护举报者免受伤害

No person may victimise or cause detriment to someone else (or threaten to do so) because of a belief that person has, will or could Speak Up. Examples of detriment include discrimination, harassment, intimidation, retaliation, causing physical or psychological harm, damaging property, varying an employee's role or duties, or demoting or dismissing the person.

任何人不得因其认为他人已对其、将对其举报或可能对其进行举报而伤害他人或对其造成伤害（或者威胁如此行事），包括歧视、骚扰、恐吓、报复、致使身体或心理受到伤害、损坏财产、改变职务或职责，或降职或解雇。

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

如果您因举报而满足附件 1 所规定的受法律保护的条件，公司将依法保护您免受伤害。如果有人导致您受到伤害或伤害您，亦或威胁如此行事，这可能构成违法，您有权寻求法律途径予以解决。在某些情况下，这还可能构成刑事犯罪。

You should tell a Recipient listed in section 5 if you are or someone else, is being subjected to detrimental conduct, if you have been or someone else has been subject to detrimental conduct, or if you are concerned that you may be victimised. Preferably, this should be the Recipient to which you made your initial Disclosure, but can be to any Recipient. The Company will treat this very seriously.

如果您或他人正在遭受伤害、或已然遭受伤害、或您担心自己可能会受到伤害，您应向第 5 条所列出的接收者提出此类问题。最佳选择是向您最初披露信息的接收者提出问题，不过您也可以选择其他接收者。公司将会对此予以高度重视。

Any person involved in detrimental conduct will be subject to disciplinary action, including but not limited to termination of employment or engagement. In some circumstances, this may also be a criminal offence punishable by imprisonment. The Company may refer any person that has engaged in victimising conduct to law enforcement authorities for further investigation.

任何参与伤害举报者的人员均将受到纪律处分，包括但不限于终止雇佣或委托合同。在某些情况下，这种伤害行为还可能构成刑事犯罪，





参与人员可能因此被判处监禁。公司可以将参与伤害行为者移交执法机关，以作进一步调查。

11.3 Other protections available

11.3 可获得的其他保护

The Company is committed to making sure that you are treated fairly and do not suffer detriment because you Speak Up. The protections offered will depend on things such as the Potential Misconduct and people involved. Protections may include the following, in the Company's discretion and as appropriate in the circumstances:

公司承诺，确保给予您公平对待，不会因为举报而受到损害。您可获得的保护取决于您所举报的潜在不当行为及该等行为所涉人员等相关因素。公司根据具体情况酌情决定提供以下保护：

- monitoring and managing the behaviour of other employees;
监督和管理其他员工的行为；
- relocating employees (which may include the people alleged to have been involved in the Potential Misconduct) to a different division, group or office, or reassignment of duties (of either you or other persons connected to the report made by you);
将员工（可能包括被指控参与潜在不当行为的人员）调职至不同部门、小组或办公室，或重新安排（您的或您的举报所涉及的相关人员的）职责；
- offering you a leave of absence or flexible workplace arrangements while a matter is investigated;
在调查期间，安排您休假或灵活安排您的工作场所；
- a Discloser who is a current employee may access the Company's wellbeing, medical and safety partner, Sonder and may also request additional support from the Company (such as counselling or other support services); and/or
身为公司在职员工的披露者可联系公司的福利、医疗和安全合作伙伴 Sonder，也可以向公司申请额外支持（例如，咨询或其他支持服务）；及/或
- rectifying any detriment that you have suffered.
弥补您所遭受的任何损害。

The Integrity Officers and/ or the Workplace Relations team supporting the Integrity Officers will be your point of contact to support and help protect you. They can arrange additional support for you where needed and can escalate any concerns you have with how your report is being dealt with.

诚信官和/或向诚信官提供支持的职场关系小组将作为您的联系人，向您提供支持及帮助公司向您提供保护。他们能够在必要时为您安排额外支持，并且会将您对于公司举报处理方式的任何顾虑向上呈报。

The Company will look for ways to support all people who Speak Up, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. Where certain support cannot be applied to non-employees (for example, because the Company cannot itself offer flexible working arrangements to a supplier), the Company will still seek to offer as much support as practicable.

公司将寻求能够为所有举报者提供支持的方式，但公司当然无法为非公司员工的举报者提供与公司员工举报者提供相同类型及水平的支持。在无法向非公司员工的举报者提供某些支持的情况下（例如，由于公司本身无法向供应商提供灵活的工作安排），公司将仍会竭力提供尽可能多的支持。

Further information regarding the protections afforded under Australian law to persons who Speak Up is available at Attachment 1.

关于澳大利亚法律为举报者提供的保护，详见附件 1。

12 Reporting

12 汇报

The Chair of the Board Human Resources and Remuneration Committee will be provided information about any material incidents raised, promptly after reports are received.

在收到举报后，接收者将立即向董事会人力资源与薪酬委员会主席汇报所举报的重大事件的相关信息。

The Board Human Resources and Remuneration Committee will periodically receive a summary of reports made under this Policy. Where appropriate, issues may be escalated to the Board.

董事会人力资源与薪酬委员会将会定期收到按照本政策要求编制而成的举报汇总。如有必要，相关问题可提交至董事会。

13 Availability of this Policy and training

13 本政策及培训的获取

The Company will inform officers and employees (including new officers and employees) about this Policy. Each officer and employee will receive a copy of this Policy and be provided with training about the Policy and their rights and obligations under it.

公司会将本政策通告给高级职员和员工（包括新任命的高级职员和新员工）。每个高级职员和员工均会收到本政策副本一份，并接受有关本政策及其权利与义务的培训。

Key officers and employees, including Recipients, will receive regular training, including in relation to how to respond to Disclosures.





包括接收者在内的主要高级职员和员工将定期接受培训，包括关于如何处理披露事项的培训。

A copy of this Policy will also be available on the Company's intranet and on the Company's public website at www.superretailgroup.com.au.
此外，也可从公司的内网及公开网站（www.superretailgroup.com.au）下载和查阅本政策。

14 Further information

14 补充信息

Any questions about this Policy or Speaking Up about Potential Misconduct under this Policy can be referred to the Integrity Officers or the Integrity Line as referred to above. Questions can be asked at any time, including before or after you have made a report under this Policy.
如对本政策或本政策规定的潜在不当行为举报有任何疑问，可与上述提及的诚信官或诚信热线联系。无论是根据本政策进行举报之前或之后，您都可以随时进行咨询。

This Policy will be reviewed from time to time and amended as required.
公司将会不时对本政策予以审查，并依需求进行修订。

This Policy does not form part of terms of employment and may be amended from time to time.
本政策不构成雇佣条款的一部分，可不时予以修正。

Related documents which you can refer to via the Company's public website include:
您可以在公司的公开网站上查阅以下相关文件：

- Code of Conduct;
《员工守则》;
- Anti-Bribery and Corruption Policy; and
《反贿赂与腐败政策》; 及
- Workplace Resolution Policy.
《职场争议解决政策》。

Document details

文件详情

Effective Date 生效日期	1 September 2026 2026 年 9 月 1 日
Policy Owner 政策负责人	Chief Legal Officer and Company Secretary 首席法务官兼公司秘书
Policy Approver 政策审批人	Board of Directors 董事会
Version 版本	2.0





Attachment 1 附件 1

Protections provided by law 法律保护

1 Additional legislative protections 1 额外法律保护

Under Australian law, including the Corporations Act 2001 (Cth) (the **Act**), legislative protections for Speaking Up are available to certain persons (including current and former employees, volunteers, officers, contractors, suppliers, employees of suppliers, associates, as well as these people's relatives and dependants) who make a protected disclosure to certain people.

根据《2001 年公司法》（以下简称“《公司法》”）等澳大利亚相关法律，针对特定人群作出的受保护披露行为的主体（包括在职与前任员工、志愿者、高级职员、承包商、供应商、供应商员工、关联方以及上述人士的亲属与受抚养者）受举报相关的法律保护。

You are encouraged to Speak Up under this Policy. However, the law offers protections in other cases (for example, you can report Potential Misconduct to people other than Recipients). If you make a protected disclosure under the law that does not comply with the Speak Up Policy, you will still be entitled to the legal protections. A disclosure can qualify for protection under the Act even if it is made anonymously or turns out to be incorrect.

公司鼓励您依据本政策进行举报。如有本政策规定以外的其他情形，法律同样给予保护举措（例如，您可以向除接收者以外的其他人举报潜在的不当行为）。即使您依法进行的受保护披露行为不符合本《畅所欲言政策》，您仍有权获得法律保护。此外，即使您以匿名方式进行举报或最终证实您的举报有误，您仍依据《公司法》获得法律保护。

Please contact a Recipient if you would like more information about legal protections.
如需了解更多关于法律保护的信息，请联系接收者。

2 Protected disclosures 2 受保护披露

To be a protected disclosure qualifying for protection under the Act, the disclosure must relate to a disclosable matter and be made to an eligible recipient under the Act. A matter that is disclosed under the Policy but which does not meet these criteria will not qualify for protection under the Act. Examples of this information and recipients are outlined in the following table.

若要符合《公司法》所规定的受保护披露之条件，披露内容务必与可披露事项相关，披露对象必须是符合《公司法》规定的接收者。倘若依据本政策披露了相关信息，但不符合上述标准的，则该披露行为不受《公司法》保护。下表列举了部分可披露事项与接收者。

Information reported or disclosed 举报或披露的事项	Recipient of disclosed information 披露事项的接收者
General disclosable matters 常见可披露事项 - Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to the Company or a related body corporate. 涉及公司或公司相关法人团体的实际或涉嫌不当行为或不当事态或情况有关的信息。 - Information that the Company or a related body corporate, or any officer or employee of the Company or a related body corporate, has engaged in conduct that: 涉及公司或公司相关法人团体、或，公司或公司相关法人团体的高级职员或员工的下列行为： - contravenes or constitutes an offence against certain legislation (e.g. the Act); or 违反或构成违反相关法律（例如，《公司法》）的行为；或 - represents a danger to the public or the financial system; or 危害公众或金融体系的行为；或 - constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. 构成违反澳大利亚联邦法律，并可被判处 12 个月或以上有期徒刑的犯罪行为。	Recipients for any general disclosable matters 常见可披露事项的接收者 - A person authorised by the Company to receive protected disclosures – i.e. Recipients under this Policy (see section 5). 经公司授权接收受保护披露的人员——本政策规定的接收者（详见第 5 条）。 - An officer or senior manager of the Company or a related body corporate. 公司或公司相关法人团体的高级职员或高级经理。 - An auditor, or a member of an audit team conducting an audit, of the Company or a related body corporate. 公司或公司相关法人团体的审计员或对公司或公司相关法人团体开展审计的审计团队成员。 - An actuary of the Company or a related body corporate. 公司或公司相关法人团体的精算师。 - ASIC, APRA or another Commonwealth body prescribed by regulation. 澳大利亚证券和投资委员会（ASIC）、澳大利亚审慎监管局（APRA）或法律条例规定的其他联邦机构。 - A legal practitioner for the purposes of obtaining legal advice or legal representation (even if the legal practitioner concludes the disclosure does not relate to a disclosable matter). 法律从业者（仅限旨在获取法律建议或法务代理的披露）（即使法律从业者认定披露内容与可披露事项无关）。





Note that personal work-related grievances are not protected disclosures under the law, except as noted below.
请注意，除下文所述情况外，个人与工作相关的申诉不属于受法律保护的范围。

Journalists or parliamentarians, under certain circumstances allowing emergency and public interest disclosures. It is important for you to understand the criteria for making a public interest or emergency disclosure before doing so. Please contact the Company's Chief Legal Officer if you would like more information about emergency and public interest disclosures.
新闻记者或国会议员（在允许进行紧急披露和公共利益披露的情况下）。在进行紧急披露或公共利益披露之前，请务必明晰相关标准。如需了解更多关于紧急披露和公共利益披露的信息，请联系公司的首席法务官。

Tax-related disclosable matters
与税务相关的可披露事项

- Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the Company or an associate, which the employee considers may assist the recipient to perform functions or duties in relation to the tax affairs of the Company or an associate.
涉及公司或关联方税务方面的不当行为或不当事态或情况的相关信息，且该等信息被员工视作能够有助于接收者履行涉及公司或关联方税务的职能或职责。

Recipients for any tax-related disclosable matters
与税务相关可披露事项的接收者

- A person authorised by the Company to receive reports of tax-related disclosable matters.
经公司授权接收与税务相关的可披露事项举报的人员。
- An auditor, or a member of an audit team conducting an audit, of the Company.
公司的审计员或对公司开展审计的审计团队成员。
- A registered tax agent or BAS agent who provides tax services or BAS services to the Company.
为公司提供税务服务或营业活动报表（BAS）服务的注册税务代理或 BAS 代理。
- A director, secretary or senior manager of the Company.
公司董事、秘书或高级经理。
- An employee or officer of the Company who has functions or duties that relate to the tax affairs of the Company.
承担与公司税务有关的职能或职责的公司员工或高级职员。
- A legal practitioner for the purpose of obtaining legal advice or legal representation.
法律从业者（仅限旨在获取法律建议或法务代理的披露）。

Further tax-related information
其他税务相关信息披露

Information that may assist the Commissioner of Taxation to perform his or her functions or duties under a taxation law in relation to the Company or an associate.
可对税务专员依据相关税法履行其与公司或关联方有关的职能或职责有所助益的信息。

Recipients for any further tax-related information
其他税务相关信息披露的接收者

- Commissioner of Taxation.
税务专员。
- A legal practitioner for the purpose of obtaining legal advice or legal representation.
法律从业者（仅限旨在获取法律建议或法务代理的披露）。

Personal work-related grievances
个人与工作相关的申诉

Legal protection for disclosures about solely personal employment related matters are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if, in summary:
个人与工作相关事项的披露仅在法律规定的特定情况下受法律保护。简而言之，如有下列任一情形，披露个人与工作相关的申诉仍受法律保护：

- it concerns detriment to you because you have or may be considering Speaking Up; or
您因为进行举报或考虑进行举报而遭受损失；或
- it is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about whistleblowers.
为获取与举报者相关法律实施方面的法律建议或法务代理服务而向法律从业者进行披露。

Under the law, a grievance is **not** a 'personal work-related grievance' if it:
根据法律规定，满足以下条件的申诉**不属于**“个人与工作相关的申诉”：

- has significant implications for an entity regulated under the law that do not relate to the discloser;
对受法律监管的实体具有与披露者无关的重大影响的；
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;
违反或涉嫌违反特定公司法和金融服务法的行为，或依据其他联邦法律，构成或涉嫌构成可被判处 12 个月或以上有期徒刑的犯罪行为；
- concerns conduct or alleged conduct that represents a danger to the public or financial system; or
危害或涉嫌危害公众或金融体系的行为；或
- concerns conduct or alleged conduct prescribed by the regulations.





法律条例规定的行为或涉嫌行为。

3 Specific protections and remedies

3 具体保护和补救措施

Additional legislative protections may also be available, including but not limited to:
举报者还可以获得额外法律保护，包括但不限于：

- compensation for loss, damage or injury suffered as a result of detrimental conduct;
对因伤害行为而遭受的损失、损害或伤害的赔偿；
- an injunction to prevent, stop or remedy the effects of the detrimental conduct;
禁止、制止或补救伤害行为造成的影响的禁令；
- an order requiring an apology for engaging in the detrimental conduct;
要求参与伤害行为者道歉的命令；
- if the detrimental conduct wholly or partly resulted in the termination of an employee's employment, reinstatement of their position;
如伤害行为是导致举报者被解雇的唯一或部分原因的，则恢复其职位；
- exemplary damages; and
惩罚性赔偿；及
- any other order the court thinks appropriate.
法院认为合适的其他命令。

You are also protected from the following in relation to a protected disclosure you make:
进行受保护的披露后，您还可以获得其他法律保护，以免您因以下事项遭受损失：

- civil liability (e.g. any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation);
民事责任（例如，以违反劳动合同、保密义务或其他合同义务为由对您提起的任何法律诉讼）；
- criminal liability (e.g. attempted prosecution of you for unlawfully releasing information, or other use of the disclosure against you in a prosecution (other than for making a false disclosure)); and
刑事责任（例如，试图以非法泄露信息为由对您提起诉讼，或在诉讼中以对您不利的方式利用您的披露行为（虚假披露除外）；及
- administrative liability (e.g. disciplinary action for making the disclosure).
行政责任（例如，因披露信息而受到纪律处分）。

However, you will not have immunity for any misconduct you have engaged in that is revealed in a disclosure.
但如果您参与了所披露的不当行为，您将失去获得任何保护的资格。



Attachment 2 附件 2

Additional protections provided by law 额外法律保护

1. New Zealand 1. 新西兰

Under New Zealand law, including the Protected Disclosures (Protection of Whistleblowers) Act, 2022 (the **POW Act**), legislative protections for Speaking Up are available to whistleblowers making disclosures that meet certain criteria. In particular you must:

根据《2022 年受保护披露（举报人保护）法》（以下简称“**POA 法**”）等新西兰相关法律，符合特定条件的举报者受举报相关的法律保护。您的举报行为必须符合以下特定条件：

- believe on reasonable grounds that there is, or has been, “serious wrongdoing” in or by the Group;
基于合理依据有理由认为集团内部存在或曾经存在，或集团在产生或已经产生“严重不当行为”；
- disclose that information in accordance with the POW Act; and
按照《POA 法》披露信息；及
- not make the disclosure in bad faith.
不得恶意进行披露。

If you make a protected disclosure about “serious wrongdoing” and a person causes detriment or victimises you, you may have a claim under the Employment Relations Act 2000 (NZ) or the Human Rights Act 1993.

如果您对“严重不当行为”予以受保护披露，而有人致使您遭受损害或对您造成伤害，您可以依据新西兰《2000 年雇佣关系法》或《1993 年人权法》提出索赔。

In relation to any protected disclosure, the Group will use its best endeavours to keep confidential any information that might identify you. However, the Group need not keep your identity confidential if:

在您作出受保护披露后，集团会竭尽全力确保对任何可能透露您身份的信息予以保密。但是，如果出现以下情形，集团无需对您的身份信息予以保密：

- you consent to the release of the identifying information and the Group has consulted with you about the release of the information; or
您同意公开您的身份信息，且集团已就公开信息事宜与您进行过协商；或
- where there are reasonable grounds to believe that the release of the identifying information is essential for the effective investigation of the disclosure; or to prevent a serious risk to public health, public safety, the health or safety of any individual or the environment; or to comply with principles of natural justice; or for the purposes of law enforcement.
存在合理依据认为公开身份信息对于有效调查披露事项，或对于防止公众健康、公共安全或个人健康或安全以及环境遭受严重危害，或对于遵守自然公正原则，或对于执法而言至关重要。

Such protections are only available when disclosures are made internally in accordance with this Policy.
只有在依据本政策进行内部披露的情况下，您才能够获得该等保护。

The POW Act also protects disclosures made to appropriate authorities including:
《POW 法》同时也对向以下有关当局进行披露的主体予以保护，包括：

- the head of any public sector organisation;
任何公共部门组织的负责人；
- any officer of Parliament;
任何议会官员；
- (as examples) the persons or bodies specified in Schedule 2 of the POW Act; or
（例如）《POW 法》附表 2 中规定的个人或机构；或
- the membership of a particular profession, trade or calling with the power to discipline its members;
有权处分其成员的特定专业、行业或职业机构的成员；

but does not include a Minister or a member of Parliament.
但不包括部长或议会议员。

The protections afforded by the POW Act do not apply where you make an allegation which you know to be false or you otherwise act in bad faith.

如果您故意做出虚假或恶意指控，您将无法获得《POW 法》规定的保护。

Please contact a Recipient if you would like more information about legal protections in New Zealand.



如需了解更多关于新西兰法律保护的信息，请联系接收者。

2 China

2 中国

Disclosers in China may be entitled to further protections under the People's Republic of China Law (PRC Law):

根据中华人民共和国法律（以下简称“中国法律”），中国的披露者可依据中国法律获得其他保护：

- “Who can Speak Up” under section 4 of this Speak Up Policy extends to individuals or entities who possess relevant information and can provide supporting evidence.
本《畅所欲言政策》第 4 条规定的“有举报资格之人”适用于掌握相关信息并能提供证据的个人或实体。
- in addition to section 9 of this Speak Up Policy, the Company will comply with its obligations under the Civil Code in relation to disclosures relating to sexual harassment; and
除本《畅所欲言政策》第 9 条的规定外，公司还将遵守《民法典》规定的与性骚扰披露有关的义务；及
- as regards section 11.3 of this Speak Up Policy, PRC Law requires the employee's consent (or the existence of some other statutory ground) to relocate an employee to a different division, group or office or to reassign a team member's duties.
关于本《畅所欲言政策》第 11.3 条，根据中国法律相关规定，将员工调职至不同部门、小组或办公室，或者重新安排小组成员工作职责，须事先征得员工同意（或存在其他法定理由）。

