

Whistleblower Policy

1. Purpose

To provide Fuji Xerox Australia (FXA) Group stakeholders -internal and external - with a mechanism for *highlighting any concerns related to suspected corrupt or illegal practices* by the company or any employee, agent or officer of the company regardless of position.

2. Scope

This policy is relevant to parties that are involved in the provision or receipt of services by FXA Group which includes but is not restricted to FXA permanent and part-time employees, contractors, agents and other sales channel partners plus customers, suppliers and members of the public who may have dealings with FXA Group entities.

3. Definitions

FXA Group includes Fuji Xerox Australia Pty Limited, Fuji Xerox Finance Limited, Fuji Xerox Sales Pty Limited and any controlled entities, such as Upstream.

4. Policy

The FXA Group is committed to a policy of exemplary corporate citizenship. As part of this policy, it expects its officers, contractors and employees to maintain the highest levels of probity in their dealings on behalf of the company and their management of the company's business. This includes strict compliance with the company's ethics code and all Laws and Regulations applying to the business.

By this policy, FXA Group seeks to encourage the reporting of corrupt or illegal practices by the company or any employee or officer of the company regardless of position. Whilst such disclosure is encouraged to occur through the normal hierarchy of the business any person may report incidents pursuant to this Whistleblower policy in circumstances where they consider the gravity of the issue warrants such approach or where they have fear of reprisal in the event of raising the matter with their operational contact.

Whistleblower Communication:

- a) All advices communicating an incident/s of corrupt or illegal conduct should be addressed to:

Whistleblowing Officer, Fuji Xerox Australia Pty Limited, 101 Waterloo Road, North Ryde NSW 2113

or by email to **Whistleblowing.Officer@aus.fujixerox.com**.

or through completion of the on-line Whistleblower Issue logging form on the FXA external website at the following link:

<http://www.fujixerox.com.au/about/contactus?pageheading=Whistle-Blower-Issue>

- b) All communications to the Whistleblowing Officer will be dealt with by the Executive General Manager, Corporate Affairs or his/her delegate.
- c) All dealings with Whistleblower disclosures will be handled in such a manner as to preserve the anonymity of the whistleblower where possible. It needs to be recognised however that total confidentiality may not be possible if the matter is to be properly investigated and appropriately responded to.
- d) Whilst anonymous submissions/advices are not encouraged, they will be accepted.
- e) All Whistleblower communications will be acknowledged within fourteen days of their receipt
- f) Whistleblowers advising incidents of corrupt or illegal conduct shall be protected from harassment or retaliation as a consequence of their disclosure. To effect this protection the Whistleblowing Officer shall maintain ongoing contact with the Whistleblower as circumstances warrant and the Whistleblower may raise issues of concern with the Whistleblowing Officer at any time
- g) False reporting shall not attract any protection under this policy.

Nick Kugenthiran
Managing Director
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