

**WHISTLEBLOWER
POLICY / 举报人政策**
DECEMBER 2019 / 2019年12月

Saputo

WHISTLEBLOWER POLICY/ 举报人政策

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1. OBJECTIVE/目标

This policy outlines how to raise a concern regarding a Whistleblower disclosure.
本政策概述了举报人举报的相关事宜。

You will not be subject to any form of retaliation or victimisation if you raise a concern in accordance with this policy.
若您根据本政策进行举报，您不会受到任何形式的报复或迫害。

This policy is available on the Saputo Dairy Australia Pty Ltd website at <https://www.saputodairyaustralia.com.au> as well as Saputo staff intranet sites.
本政策可于 Saputo Dairy Australia Pty Ltd 的网站（<https://www.saputodairyaustralia.com.au>）及 Saputo 的员工内部网站上获取。

2. DEFINITIONS/ 定义

Term 术语	Definition 定义
Associate 关联方	Has the meaning set out in section 11 of the <i>Corporations Act 2001</i> . 具有 2001 年《公司法》第 11 条的所定义的含义。
Detrimental Conduct 不利行为	Has the meaning set out in clause 4.6 of this policy. 具有本政策第 4.6 条所定义的含义。
Eligible Person 适格人员	Has the meaning set out in clause 4.1.1 of this policy. 具有本政策第 4.1.1 条所定义的含义。
Reportable Conduct 可报告的行为	Has the meaning set out in clause 4.1.2 of this policy. 具有本政策第 4.1.2 条所定义的含义。
Saputo or We/we Saputo 或 我们	Saputo Dairy Australia Pty Ltd and its related bodies corporate (as defined in the <i>Corporations Act 2001</i>). 指 Saputo Dairy Australia Pty Ltd 及其相关法人团体（定义见 2001 年《公司法》）。
Whistleblower 举报人	An Eligible Person who makes a disclosure of Reportable Conduct in accordance with this policy. 指根据本政策举报可报告的行为之适格人员。
You 您	Reference to “You”, “you” or “your” is to a Whistleblower or someone contemplating making a disclosure under this policy. “您”、“您的”指举报人或意图根据本政策进行举报的人员。

3. LIST OF RELATED DOCUMENTS/ 相关文件清单

Category 类别	Number 序号	Title/Hyperlink 名称/超链接
Code 行为规范	n/a	Saputo Code of Ethics Saputo 道德规范

4. POLICY/ 政策

This policy outlines the processes and protections provided by Saputo to support the disclosure of Reportable Conduct. Saputo must comply with the obligations relating to the protection of Whistleblowers in the *Corporations Act 2001* and any other relevant legislation. 本政策概述了 Saputo 为支持举报可报告的行为而规定的流程及保护措施。Saputo 应当遵守 2001 年《公司法》及任何其他相关法律下对举报人的保护义务。

This policy has been established to:

本政策为以下目的而制定：

- support Saputo values;
支持 Saputo 的价值观；
- encourage the appropriate disclosure of Reportable Conduct;
鼓励对可报告的行为进行适当举报；
- highlight the prohibition against victimisation, discrimination and other Detrimental Conduct towards a person who makes a Whistleblower disclosure; and
强调禁止针对举报人举报的迫害、歧视及其他不利行为；及
- provide you with a confidential (and anonymous, if requested) process to support reporting.
向您提供（经要求可匿名的）支持举报的保密流程。

The policy binds all Saputo directors, officers, employees and contractors.

本政策约束 Saputo 所有的董事、管理人员、雇员及承包方。

This policy does not form part of any contract of employment or any industrial agreement.

本政策不构成任何劳动合同或行业协议的一部分。

4.1 Scope of policy/ 政策范围

4.1.1 Who is a Whistleblower? / 谁是举报人？

A Whistleblower is someone with a connection to Saputo who makes a disclosure of Reportable Conduct under this policy, they may be:

举报人是根据本政策举报了可报告的行为的、与 Saputo 有关联的人，他们可以是：

- an employee;
雇员；
- an officer;
管理人员；
- a contractor;
承包方；
- a supplier of goods and / or services (paid or unpaid);

商品和/或服务的供应商（无论是否进行支付）；

- an employee of a supplier of goods or services;
商品或服务的供应商之雇员；
- an Associate; or
关联方；或
- a relative, spouse, dependent or dependent of a spouse of an individual who is themselves eligible to be a Whistleblower,
有资格成为举报人的个人之亲属、配偶、被扶养人或配偶的被扶养人

(each an **Eligible Person**).

（以上人员被单独称为**适格人员**）。

A person who makes a Whistleblower disclosure will be protected as outlined in this policy.
进行了举报人举报将按本政策所述方式被保护。

4.1.2 What is *Reportable Conduct*? / 什么是可报告的行为?

Reportable Conduct may include fraud, corruption, illegal or unethical business practices, misconduct, including in relation to corporate governance and tax, dishonest practices, serious mismanagement, property damage, misuse of company resources, criminal behaviour and other breaches of legislation.

可报告的行为可能包括欺诈、贿赂、非法或不道德的商业行为、不当行为，包括与公司治理和税务相关的行为、不诚信行为、严重的管理不善、财产损失、不当使用公司资源、犯罪行为及其他违法行为。

4.1.3 What is *NOT Reportable Conduct*?/ 什么不是可报告的行为?

Reportable Conduct **does not** include any personal work-related grievance. A work-related grievance should be raised through your Human Resources Business Partner, or escalated to the Senior Vice President (SVP) of Human Resources.

可报告的行为**不包括**任何与工作相关的个人不满。工作相关的不满应向您的人力资源业务伙伴提出，或进一步上报到人力资源高级副总裁（SVP）处。

A work-related grievance may, however, fall under this policy if the grievance relates to the way a Whistleblower is treated as a result of their disclosure of the Reportable Conduct.

然而，若工作相关的不满与举报人因举报了可报告的行为而遭受的对待有关，则此类不满受本政策管理。

Conduct that is not Reportable Conduct **will not** attract the protections outlined in this policy.
若行为并非可报告的行为，则**将不会**引发本政策下的保护措施。

4.1.4 Reasonable Grounds / 合理依据

When making a disclosure, you must have reasonable grounds for believing the information you are disclosing is true.

当您举报时，您应具有相信您所举报的信息真实的合理依据。

You will not be penalised if the information turns out to be incorrect, provided you had reasonable grounds for your belief.

若您所举报的信息被证实有误，而您有合理依据相信您的信息，您不会因此受到处罚。

If it is found that you knowingly made a false report, it will be considered a serious matter that may result in disciplinary action.

若您被发现故意进行虚假举报，该行为将被视为可导致纪律处分的严重情形。

4.2 Who can you make a disclosure to?/ 您可以向谁举报?

A Whistleblower can disclose the Reportable Conduct in any of the following ways:

举报人可以通过以下任一种方式举报可报告的行为

	Disclosure method 举报方式	Contact method 联系方式
1.	Via email 邮件	ethics@saputo.com
2.	Whistleblower Hotline 举报人热线 The Whistleblower Hotline is a 24/7 dedicated service managed by an external vendor on behalf of Saputo. 举报人热线是 24/7 的专门服务，由外部供应商代表 Saputo 进行管理 Anonymous reporting is available through this service. 可通过该热线进行匿名举报。	<ul style="list-style-type: none">From Australia: 1300 30 45 50; or 澳大利亚境内拨打热线: 1300 30 45 50; 或者From overseas: +613 9811 9275 (reverse charge call). 境外拨打热线: +613 9811 9275 (对方付费电话)。
3.	Directly to: 直接向以下人员举报: <ul style="list-style-type: none">the SVP of Finance, Human Resources, or the Head of Legal;	In person, or via your preferred method of communication (for

<p>财务、人力资源高级副总裁或法律主管；</p> <ul style="list-style-type: none"> • any Senior Leadership Team (SLT) member; 任何高级领导团队（SLT）成员； • a director or other officer of Saputo; Saputo 的董事或其他高管； • Saputo’s auditor (Deloitte); Saputo 的审计师（德勤）； • regulatory bodies such as ASIC; 监管机构，如 ASIC； • a legal practitioner, for the purpose of obtaining legal advice in connection with a Whistleblower disclosure or potential disclosure; and 法律从业人员，目的是获得与举报人举报或潜在举报有关的法律意见； 以及 • under certain circumstances, journalists and members of Commonwealth, State or Territory parliaments. (see clause 4.11). 在某些情况下，记者或英联邦、州或地区议会成员。（见 4.11 条） 	<p>example, email, phone call or written correspondence). 可以当面或者通过您喜欢的沟通方式举报（例如电子邮件、电话或书面信函）。</p>
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4.3 Further information/ 更多信息

If you require further information prior to making a disclosure, you can contact the Saputo Head of Legal on +61 3 9040 5000 or if you wish to remain anonymous, contact the Whistleblower Hotline.

如果您在举报前需要更多信息，您可以拨打+61 3 9040 5000 联系 Saputo 的法律主管，或者如果您希望保持匿名，请联系举报热线。

4.4 Anonymity/ 匿名

You may choose to make a disclosure anonymously.

您可以选择匿名举报。

If you make an anonymous disclosure through the Whistleblower Hotline, you will receive a reference number specific to your matter.

如果您通过举报热线匿名举报，您将获得一个与您的问题相关联的参考编号。

You can contact the Whistleblower Hotline at any time and identify your matter using this reference number. This will allow you to request an update, or provide further information

about your disclosure, without revealing your identity.

您可以随时联系举报人热线，并使用此参考编号识别您的问题。您可以据此请求更新，或提供有关您的举报的更多信息，并且不泄露您的身份

4.5 Confidentiality/ 保密

Subject to exceptions set out in this policy, it is illegal to identify a Whistleblower or disclose information likely to do so.

除本政策中规定的例外情况，识别举报者或泄露可能识别出举报者的信息是非法的。

All information received from you will be treated confidentially. However, Saputo will determine if it is reasonably necessary to share the information you have provided (other than your identity, but which may lead to your identification) for the purposes of an investigation. If it is reasonably necessary to do so, Saputo will take all reasonable steps to reduce the risk that you will be identified.

从您这里收取的所有信息都将被保密。但是，为了调查的目的，Saputo 将确定是否有共享您提供的信息的合理必要（除了您的身份之外的信息，其可能导致您身份泄露）。如果确实有必要，Saputo 将采取所有合理的措施来减少您身份泄露的风险。

As far as possible, the information disclosed will be limited to the individuals involved in the protection and investigative processes as outlined in this policy, as well as any persons required to be informed from a corporate governance perspective.

所举报的信息将尽可能限于本政策中概述的保护和调查过程中涉及的个人，以及从公司治理角度需要知情的任何人知晓。

Any files created or reports will be kept secure.

保证所有被创建的文件和报告的安全。

If you make a disclosure, your **identity** will only be shared if:

如果您进行举报，只有在以下情况您的**身份**才会被披露：

- you give your consent; or
您表示同意；或者
- allowed or required by law (for example, to obtain legal advice, or to report a matter to the Australian Federal Police).
法律允许或者要求的情况（例如，为获得法律建议，或向澳大利亚联邦警察报告问题）

4.6 Detrimental Conduct Prohibition/ 禁止不利行为

It is illegal for a person to engage in any type of detrimental conduct against a Whistleblower. Detrimental conduct means any actual or threatened conduct (which could be implied or express, conditional or unconditional), that could cause damage to a Whistleblower as a result of making a disclosure. It includes harassment, intimidation, damage to property, person,

reputation or financial position, discrimination in, or alteration of a person's position of employment or dismissal from employment (**Detrimental Conduct**).

任何人对举报人实施任何形式的不利行为都是违法的。不利行为是指由于举报而对举报人造成损害的任何实际损害或威胁行为（可能是暗示的或明示的，有条件的或无条件的）。其包含骚扰，恐吓，损害财产、人身、名誉或财务状况，歧视或改变某人的工作职位或解雇（**不利行为**）。

We will take reasonable steps to protect a Whistleblower from Detrimental Conduct and will take appropriate action if such conduct is identified.

我们将采取合理的措施，保护举报者免受不利行为的侵害，并在发现此类行为后采取适当行动。

We also prohibit all forms of Detrimental Conduct against a person because they are involved in an investigation of a Whistleblower disclosure.

我们也禁止因为他们涉及对举报人举报的调查而对其采取一切形式的不利行为，。

4.7 Scope of prohibition on Detrimental Conduct & Confidentiality/ 禁止不利行为和保密的范围

The protections for Whistleblowers outlined in this policy will apply regardless of whether a Whistleblower disclosure is made internally (for example, to Saputo or via its Whistleblower Hotline) or externally (for example, to a regulator, member of parliament or journalist).

本政策中概述的对举报者的保护都将适用于内部（例如，向 Saputo 或通过举报者热线）和外部（例如，向监管机构、议员或记者）举报人举报。

4.8 Assessment and investigation/ 评估和调查

4.8.1 Review and assessment of disclosure/ 举报的审查和评估

The Reportable Conduct Committee (**RCC**) comprises the SVPs of Finance, Human Resources and the Head of Legal. Other persons may be appointed by the SLT from time to time.

可报告的行为委员会（**RCC**）由财务、人力资源的高级副总裁和法律主管组成。SLT 可不时任命其他人员。

The RCC will determine if a disclosure is a Whistleblower disclosure, and will decide whether the allegations raised should be investigated.

RCC 将确定举报是否属于举报人举报，并将决定是否应对所提出的指控进行调查。

Saputo's response to a Whistleblower disclosure will vary depending on its nature (including the amount of information provided). The RCC will take reasonable steps to advise you of the decision whether to investigate, and the result of any investigation, unless the RCC has no way to contact you.

Saputo 对举报人举报的回应将因其性质（包括提供的信息量）而有所不同。RCC 将采取合理措施，告知您是否进行调查的决定以及任何调查的结果，除非 RCC 无法与您取得联系。

If the RCC decides that the Whistleblower disclosure will be investigated, the RCC will conduct or commission an investigation. The RCC may request Saputo staff or an external provider to carry out investigations and communications on its behalf.

如果 RCC 决定对举报人举报进行调查，RCC 将进行或委托进行调查。RCC 可要求 Saputo 员工或外部供应商代表其进行调查和沟通。

If the RCC, the SLT or the Whistleblower believes that the ability of the RCC or SLT to appropriately address the Whistleblower disclosure is compromised (for example, if the disclosure relates to a member of the RCC or SLT), appropriate steps will be taken to address the concern, including, where required, quarantining an individual for the duration of the investigation.

如果 RCC、SLT 或举报人认为 RCC 或 SLT 适当处理举报人举报的能力受到影响（例如，如果举报涉及 RCC 或 SLT 成员），则将采取合理措施解决问题，包括在调查期间隔离个人。

4.8.2 Investigation procedure/ 调查程序

Investigations will be conducted promptly, taking into account the circumstances of the Whistleblower disclosure. The RCC will respond to a Whistleblower (if they have a means to contact them) and will make a decision whether an investigation is required, within 10 days of receiving the disclosure. We may take up to 60 days from the date of receipt to review and investigate a disclosure, depending on the complexities of the matter, and in some cases the time frame may need to be extended. If there is a need to extend the investigation period, we will update the Whistleblower as to the revised timeframe (provided we have a means to do so).

调查将在考虑举报人举报的情况下迅速开展。RCC 将对举报人作出回应（如果 RCC 有办法联系举报人），并在收到举报后 10 天内决定是否需要调查。根据问题的复杂性，从收到举报之日起，我们可能最多需要 60 天的时间来审查和调查举报，在某些情况下，可能需要延长期限。如果有必要延长调查期限，我们将告知举报人延长的期限（前提是我们有办法这样做）。

An investigation will be carried out in an independent and fair way and will remain confidential. Anyone subject to allegations as a result of the Whistleblower disclosure will be given a reasonable opportunity to respond to the allegations.

调查将以独立和公正的方式进行并予以保密。由于举报人举报而受到指控的任何人都将有合理的机会对指控进行回应。

Unless the Whistleblower has consented, their identity will remain confidential, subject to the exemptions allowed under the law and outlined in this policy.

除非举报人同意披露，否则举报人的身份将得到保密，但须遵守法律和本政策概述的例外规定。

4.8.3 Investigation outcome/ 调查结果

To the extent allowed under law (and provided the RCC has a way to contact you), the RCC will regularly update you and/or any person against whom allegations have been made, of the progress as well as the findings of an investigation.

在法律许可的范围内（并且以 RCC 可以与您联系为前提），RCC 将定期向您和/或任何被指控的人通报调查的进展和调查结果。

4.8.4 Investigation outcome reporting

调查结果报告

The RCC will update the SLT as appropriate during any investigation initiated under clause 4.8.1.

在根据第 4.8.1 条发起的任何调查的期间，RCC 将酌情通报 SLT。

At the conclusion of an investigation, the RCC will report on the investigation and outcome to the SLT.

调查结束时，RCC 将向 SLT 报告调查和结果。

4.9 Whistleblower support/ 举报人支持

If you are a current employee or contractor of Saputo, or an immediate family member of a current employee or contractor, you can access the Saputo Employee Assistance Program confidential counselling service (EAP), by calling 1300 OUR EAP.

如果您是 Saputo 的现任员工或承包商，或是现任员工或承包商的直系亲属，您可以通过拨打 1 300 OUR EAP 获得 Saputo 员工协助项目的保密咨询服务（EAP）。

The EAP service is available only to Australian based personnel. Employees or contractors based outside Australia who have made a Whistleblower disclosure and require support, should contact the SVP of Human Resources, Head of Legal, or place a request via the Whistleblower Hotline.

EAP 服务仅适用于在澳大利亚就职的雇员。在澳大利亚以外地区就职的雇员进行举报人举报且寻求支持的，应当联系人力资源高级副总裁，法律主管，或通过举报热线提出协助请求。

4.10 Escalation of concerns/ 举报上报

You can escalate your Whistleblower disclosure directly to the RCC if you believe that your disclosure has not been received by the RCC or appropriately actioned.

如果您认为 RCC 没有收到您的举报人举报被或未得到适当处理，您可以将您的举报直接提交给 RCC。

You can request that the RCC escalate your concerns to the SLT if you are not satisfied with the actions of the RCC, the findings of the investigation, or a decision of the RCC not to conduct an investigation.

如果您对 RCC 的行动、调查结果、或者 RCC 不调查的决定不满意，您可以要求 RCC 将您的举报提交至 SLT。

If you make a request for escalation, you may provide the RCC with a written submission setting

out your concern. They will send this to the SLT, which will be required to review your submission. The SLT is not required to re-open the investigation if it does not believe such action is warranted in the circumstances.

如果您要求上报，您可以向 RCC 提交一份书面申请说明您的举报。RCC 会将其提交至 SLT 要求其进行审核。如果 SLT 不认为这种情况下采取行动是必要的，则 SLT 无须重新开始调查。

4.11 Public Interest Disclosure or Emergency Disclosures/ 公共利益举报或紧急情况举报

In certain circumstances, if a Whistleblower disclosure has been made, but not addressed, and the Whistleblower believes that:

在某些情况下，如果举报人已经揭发，但没有得到处理，且举报人认为：

- there is a public interest in making a further disclosure; or
出于公共利益需要进一步举报；或者
- the information disclosed concerns a substantial and imminent danger to the health, or safety of persons or the environment (**Emergency**),
所举报的信息可能对人的健康安全或对环境造成严重和直接的危害（**紧急情况**）

the Whistleblower can make a disclosure to a journalist or to an Australian State, Federal or Territory member of parliament.

则举报人可以向记者或澳大利亚州、联邦或地区议员揭发。

4.11.1 Public Interest Disclosure/ 公共利益举报

You may make a Public Interest Disclosure if:

您可以提出公共利益举报，如果：

- you have previously made a Whistleblower disclosure (**Initial Disclosure**);
您已经作出了举报人举报（**初始举报**）
- at least 90 days have passed since the Initial Disclosure; and
初始举报后至少经过了 90 天；且
- you have reasonable grounds to believe:
您有合理依据认为：
 - action is not being taken to address the matters raised in the Initial Disclosure; and
初始举报并没有被采取合理行动进行处理；且
 - a Public Interest Disclosure would be in the public interest.
公共利益揭发是出于维护公共利益目的。

Before making a Public Interest Disclosure, you need to provide written notice (for example, via email) to the person who received your Initial Disclosure, identifying your matter and advising that you intend to make a Public Interest Disclosure.

在进行公共利益举报前，您需要向接收您初始举报的人员发送书面通知（例如通过邮件方式），说明您的事项并表明您意图采取公共利益举报。

In making a Public Interest Disclosure, you must not disclose more information than is required to disclose the relevant Reportable Conduct.

您不能在公共利益举报中披露超过举报相关可报告的行为所必须的信息。

4.11.2 Emergency Disclosure/ 紧急情况举报

You may make an Emergency Disclosure if:

您可以提出紧急举报，如果：

- **an Initial Disclosure has been made; and**
已经作出初始举报；且
- **you have reasonable grounds to believe that the information concerns an Emergency.**
您有合理依据认为相关信息涉及紧急情况。

Before making an Emergency Disclosure, you need to provide written notice to the person who received your Initial Disclosure, identifying your matter and advising that you intend to make an Emergency Disclosure.

在作出紧急情况举报前，您需要向接收您初始举报的人员发送书面通知，说明您的事项并表明您意图采取紧急情况举报。

In making an Emergency Disclosure, you must not disclose more information than is required to disclose the Emergency.

您不能在紧急情况举报中披露超过举报紧急情况所必须的信息。

4.12 Reporting to regulators or statutory authorities/ 向监管机构或法定机构报告

Nothing in this policy is intended to restrict you from disclosing Reportable Conduct, providing information to, or communicating with a government agency, law enforcement body, or a regulator.

本政策无意限制您向政府机构、执法机构或监管机构举报可报告的行为、提供相关信息或进行沟通。

4.13 Remedies for breach of Whistleblower laws/ 违反举报法律的救济

If Whistleblower laws are breached (for example, if a Whistleblower suffers harassment as a result of making a disclosure), a Whistleblower can seek remedies, including compensation, from a person directly, or from Saputo.

如果举报相关法律被违反（例如，举报人因为举报行为而受到骚扰），举报人可以直接向违反者或者向 Saputo 寻求救济，包括赔偿。

4.14 No liability for disclosure/ 举报责任豁免

A Whistleblower will not be subject to any civil, criminal, administrative, contractual or other liability on the basis of the Whistleblower disclosure having been made, provided the Whistleblower had reasonable grounds for believing the information disclosed to be true.

只要举报人有合理依据认为所揭发的信息是真实的，举报人不会因为举报而承担任何民事、刑事、行政、合同或其他责任。

4.15 Breach of policy/ 违反政策

Breach of this policy will be regarded as misconduct, which may lead to disciplinary action (including termination of employment or engagement).

违反本政策将被视为不当行为，可能导致纪律处分（包括终止雇佣或聘用）。