

## **A. JUNO COVER NOTE**

- 1 In response to a request from the Commission dated 2 February 2018 Westpac is providing the attached Schedule of incidents of potential misconduct that Westpac has identified through its breach reporting processes and other relevant source documents, as well as from its incident reporting platform, known as JUNO.
- 2 JUNO is designed to facilitate the ready recording of incidents by all Westpac staff members to ensure potential conduct issues affecting the business are identified in a timely manner and then considered as part of our risk and compliance management processes. The records in JUNO represent a record of the incident as it was understood at the time of entry by the person who makes it.
- 3 The records and descriptions of incidents in JUNO thus reflect the early recording of incidents by many different users across the Group, often before all the relevant facts and circumstances are known. The entries are not always easy to understand without broader context. Importantly, it cannot be assumed that the records obtained from the JUNO system are an accurate, complete or up to date record of the relevant issue identified. The JUNO system does not usually record the manner in which issues were ultimately handled and is not routinely updated as other facts emerge or change. Where appropriate, these tasks are undertaken by other aspects of Westpac's management systems, such as breach reporting and voluntary disclosures to regulators, and management and Board reporting processes.
- 4 Finally, Westpac notes that because the information was compiled from various sources in a short timeframe incidents are sometimes inadvertently recorded in multiple entries.