



## HIGH COURT OF AUSTRALIA

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#### Details of Filing

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**IN THE HIGH COURT OF AUSTRALIA  
MELBOURNE REGISTRY**

**AB (A PSEUDONYM)**  
First Appellant

**CD (A PSEUDONYM)**  
Second Appellant

and

**INDEPENDENT BROAD-BASED ANTI-CORRUPTION COMMISSION**  
Respondent

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**AMENDED REDACTED SUBMISSIONS OF THE APPELLANTS**

**PART I FORM OF SUBMISSIONS**

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1. These redacted submissions are ~~not~~ in a form suitable for publication on the internet.

**PART II CONCISE STATEMENT OF ISSUES**

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2. Where the Independent Broad-based Anti-corruption Commission (**IBAC**) intends to cause a special report to be transmitted to Parliament and to include in it “a comment or an opinion which is adverse to any person”, s 162(3) of the *Independent Broad-based Anti-corruption Commission Act 2011* (Vic) (**IBAC Act**) requires that IBAC must first provide the person “a reasonable opportunity to respond to the adverse material”. Is the “adverse material” only the adverse comment or opinion (as the Court of Appeal held) or does it include the substance of the material on which the adverse comment etc. is based?

**PART III SECTION 78B NOTICE**

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3. No notice is required to be given under s 78B of the *Judiciary Act 1903* (Cth).

**PART IV DECISIONS BELOW**

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4. The reasons for judgment below are *AB (a pseudonym) v Independent Broad-based Anti-corruption Commission* [2022] VSC 570 (**PJ**) and *AB (a pseudonym) v Independent Broad-based Anti-corruption Commission* [2022] VSCA 283 (**CA**).

## PART V RELEVANT FACTS

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5. Between 2019 and 2021, IBAC conducted an investigation into allegations of [REDACTED].
6. On 4 and 5 November 2020, pursuant to a summons served upon him by IBAC in the course of its investigation, AB gave evidence in a private examination conducted by IBAC. [REDACTED].
- 10 7. IBAC subsequently prepared a draft special report setting out its provisional findings and recommendations. The draft report contains adverse comments and opinions that are adverse to AB and CD. Purportedly in compliance with the s 162(3) of the IBAC Act, on 6 December 2021, IBAC sent to AB a redacted version of the draft report and requested that he provide his response to it by 20 December 2021.
8. On 12 December 2021, AB's solicitor wrote to IBAC requesting the transcript of his witness examination, the transcripts of examinations of other witnesses and copies of other materials upon which IBAC relied in preparing the draft report.
9. On 14 December 2021, IBAC agreed to provide the transcript of AB's examination, but refused to provide any other material on which it relied.
- 20 10. On 31 January 2022, AB commenced a proceeding in the Supreme Court of Victoria alleging that IBAC had denied him procedural fairness and failed to comply with s 162(3) of the IBAC Act.
11. On 7 February 2022, IBAC served CD with the same redacted version of the draft report that had been provided to AB and sought a response from CD by 21 February 2022.
12. On 11 February 2022, CD was added as a party to AB's proceeding against IBAC.

## PART VI ARGUMENT

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### A. INTRODUCTION

13. Section 162(1) of the IBAC Act provides that “[t]he IBAC may at any time cause a report to be transmitted to each House of the Parliament on any matter relating to the performance of its duties and functions”.

14. However, there are duties imposed on IBAC in s 162(2)-(4) that are designed to afford procedural fairness to persons and bodies whose interests would be affected by IBAC transmitting such a report to Parliament.

14.1. If IBAC intends to include in a report an “adverse finding about a public body”, then under s 162(2) it “must give the relevant principal officer of that public body an opportunity to respond to the adverse material and fairly set out each element of the response in its report”.

14.2. If IBAC intends to include “a comment or an opinion which is adverse to any person”, then under s 162(3) it “must first provide the person a reasonable  
10 opportunity to respond to the adverse material and fairly set out each element of the response in its report”.

14.3. If IBAC intends to include “a comment or an opinion about any person which is not adverse to the person”, then under s 162(4) it “must first provide that person with the relevant material in relation to which the IBAC intends to name that person”.

15. The expression “adverse material” in s 162(2) and (3), and the corresponding expression “relevant material” in s 162(4), are not defined in the IBAC Act.

16. The focus of this appeal is whether the expression the “adverse material” in section 162(3) of the IBAC Act means the “material upon which IBAC’s adverse comments or opinions  
20 contained in the draft report were based” (**PJ[147]**) or merely the adverse comment or opinion in the draft report (**CA [132]**). That issue is to be resolved by applying well established principles of statutory construction.

17. For the reasons that follow, the Court of Appeal erred in its construction of 162(3) of the IBAC Act. And, if the Court’s construction was wrong, then its dispositive orders were also wrong.

## **B. STATUTORY TEXT**

18. The starting point is the statutory text.

19. “Adverse material” is an expression with a well-established meaning in administrative law, and specifically in the context of law of procedural fairness. The expression captures  
30 information or evidence before a decision-maker, which may be relied on in exercising a

power apt to affect the rights of interests of another person.<sup>1</sup> The “material” (i.e., the information or evidence) is “adverse”, because it may incline the decision-maker to make a decision adverse to that person’s interests.

20. Having used an expression familiar to the Executive and the courts with respect to an aspect of the law of procedural fairness,<sup>2</sup> in a provision designed to confirm the existence and clarify the scope of a duty of procedural fairness of IBAC, the Court should be inclined to the view that Parliament intended to convey that familiar meaning.
21. Moreover, the word “material”, as an ordinary English noun, is not apt to be confined to an evaluative conclusion (a finding, comment or opinion). Most aptly in this context, the *Macquarie Dictionary* defines the word to mean “information, ideas, or the like on which a report, thesis, etc., is based”.<sup>3</sup> The ordinary meaning of the word “material”, construed in its immediate context here, thus encompasses information or evidence on which a relevant comment or opinion in a special report is based.
22. The Court of Appeal sought to justify its construction of the expression in two ways based on the text of the provision, neither of which is convincing.
23. The Court of Appeal’s first justification relied on the use of the definite article (“the adverse material”), which, it held, should be understood to refer back to the “comment or ... opinion” previously mentioned in s 162(3): CA[127]. But this approach gives more significance to the use of the definite article than is warranted. Indeed, the use of the definite article here is equivocal on the question of construction.
24. An article was called for, and to use the indefinite article would be ungrammatical. To use no article, or to use the word “any”, would make little sense on either construction. On the appellants’ construction, necessarily, if IBAC intends to include a “comment or opinion which is adverse to any person” in a special report, IBAC must have at least some information or evidence to support such a comment or opinion.

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<sup>1</sup> See, e.g., *SZBEL v Minister for Immigration and Multicultural and Indigenous Affairs* (2006) 228 CLR 152, [29] (Gleeson CJ, Kirby, Hayne, Callinan and Heydon JJ); *BRF038 v Republic of Nauru* (2017) 91 ALJR 1197, [59] (Keane, Nettle, Edelman JJ).

<sup>2</sup> See, e.g., *Deputy Federal Commissioner of Land Tax v Hindmarsh* (1912) 14 CLR 334, 337-338 (Barton J); *Yorke v Lucas* (1985) 158 CLR 661, 668 (Mason ACJ, Wilson, Deane and Dawson JJ).

<sup>3</sup> *Macquarie Dictionary* (online edition).

25. Moreover, the use of the definite article is consistent with the appellants' construction. While "it is a natural and correct use of English to employ the definite article when one is referring to a person or thing already identified expressly or by implication",<sup>4</sup> the appellants' construction also has a referential quality. The comment or opinion already mentioned in s 162(3) is the hinge for the identification of the adverse "material" (in the sense of information or evidence) in the ordinary sense in which the expression is used in the law of procedural fairness. The appellants' construction therefore both allows the definite article used by Parliament to have a referential operation, while adhering to the otherwise compelling construction of the words "adverse material".
- 10 26. The Court of Appeal's second justification looked to the wider context of s 162(2) to (4), and sought to derive a meaning of "the adverse material" from a perceived consistency of usage of the word "material" in these sub-sections. The Court concluded that the word "material" was used in each sub-section as a convenient shorthand apt to refer back to the "adverse findings" in sub-s (2), "comment or [] opinion which is adverse" in sub-s (3) and to the non-adverse "comments or [] opinion" in sub-s (4), respectively: **CA[132]**.
27. But if Parliament had simply intended to refer back to the "comment or opinion which is adverse to any person" previously referred to, it could have done so by simply saying "that comment or opinion". Instead, Parliament introduced a different concept ("material"). The use of different language, especially when that would have been unnecessary if Parliament had intended to convey the meaning that IBAC seeks to attribute to s 162(3), tends to suggest that Parliament intended a different meaning.<sup>5</sup> As Leeming has observed in similar context, "[t]he difference in language is of some significance, for 'the habit of a legal draftsman is to eschew synonyms'".<sup>6</sup>
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28. But even if IBAC were to assert that the language used by Parliament in s 162(3) (and sub-section (2)) – "the adverse material" – was an available drafting choice consistent with an intention to "refer back" to the "comment or ... opinion" (or "findings" in sub-section (2)), the Court of Appeal's attempt to apply a consistent construction throughout s 162 founders when regard is had to sub-section (4). If "the relevant material in relation

<sup>4</sup> *Tamas v Victorian Civil and Administrative Tribunal* (2003) 9 VR 154, [8] (Callaway JA).

<sup>5</sup> See, e.g., *Taheri v Vitek* (2014) 87 NSWLR 403, [124] (Leeming JA, Bathurst CJ and Emmett JA agreeing).

<sup>6</sup> *Paul v Cooke* (2013) 85 NSWLR 167, [44] (Leeming JA, Ward JA agreeing), citing *Prestcold (Central) Ltd v Minister of Labour* [1969] 1 WLR 89, 97 (Lord Diplock). Lord Diplock continued: "He [a professional legal draftsman] uses the same words throughout the document to express the same thing or concept, and consequently if he uses different words the presumption is that he means a different thing or concept."

to which IBAC intends to name the person” in sub-section (4) were to be construed as merely intended to refer back to “a comment or an opinion about any person which is not adverse to the person” already mentioned (consistent with the Court’s approach to s 162(3)), then that would involve not just attributing an inelegant drafting choice to Parliament; it would involve attributing a perverse use of language.

29. It is the appellants’ construction (and only the appellants’ construction) that gives the word “material” a consistent and coherent meaning throughout s 162. The “adverse material” in sub-ss (2) and (3), and the “relevant material” in sub-s (4), is the material (in the sense of information) upon which the previously referred to findings, comments or opinions in the draft report are based.

## C. BROADER CONTEXT AND PURPOSE

### C.1 The problem of confidentiality

30. Section 166(1) of the IBAC Act prohibits the disclosure of any information contained in a proposed report, or a draft of a proposed report, prior to its publication subject to some presently irrelevant exceptions. This provision was prominent in the Court of Appeal’s analysis: **CA[134]-[136]**.
31. The Court held that the focus of s 166 “strongly suggests” that s 162(3) “is confined to the adverse comments or opinions in the draft report” and “any other contents of the draft report which disclose the basis upon which IBAC formed them or which would provide necessary context for them”: **CA[135]**. The Court posited that if “adverse material” extended to underlying material beyond the draft report then “one would have expected that s 166 would have been expressed to encompass that material”: **CA[134]**. The Court perceived “scope for adverse consequences” as a result of “disclosure of sensitive information” on the primary judge’s construction: **CA[138]**.
32. But there is no gap. IBAC can provide adverse material subject to a confidentiality notice in accordance with the regime in Div 3 of Part 2 of the IBAC Act. The Court of Appeal correctly accepted that IBAC had such a power, but then erred in (in effect) assuming that Parliament has constrained the scope of the procedural fairness duty in all cases on the basis that that IBAC might conceivably in some cases fail to exercise its available powers appropriately: **CA[136]**. That is a peculiar premise on which to construe an Act. The Court should ordinarily proceed on the basis that Parliament expects that the Executive (here being IBAC) will exercise available powers where appropriate.

33. There is a far better explanation for s 166. It is readily understandable why Parliament would, by s 166, wish to protect a draft report from disclosure in every case subject to certain specific permissions: every draft report will reflect IBAC’s preliminary work product, which is inherently unsuitable for wider dissemination.
34. By contrast, there is no basis for supposing that Parliament would wish that information on which provisional adverse comments etc. in a draft report must not be disclosed to such persons about whom those adverse comments are proposed to be made. Such material may include information that is not confidential or otherwise sensitive, some of which indeed might already be in the public domain. Appreciation of this underlines why Parliament would be taken to expect IBAC to exercise its powers as appropriate, on a case by case basis.
35. The IBAC Act allows IBAC to work out whether and, if so, what and how adverse material should be protected from wider dissemination. The *Public Interest Disclosure Act 2012* (Vic) also provides protection from “detrimental action” for persons who make a disclosure, or who cooperate with an investigation.<sup>7</sup>
36. Further, it would ordinarily be open to IBAC to discharge its duty in s 162(3) by disclosing only the substance of evidence or information on which it has relied in forming its (provisional) adverse comments or opinions,<sup>8</sup> provided that sufficient context is given to allow the affected person a meaningful opportunity to respond.<sup>9</sup>
37. Thus, the appellants’ construction is not incompatible with a regime to suitably protect the confidentiality of certain information. Indeed, the appellants’ construction recognises that IBAC can tailor appropriate orders for the protection of particular information, and avoids the unattractive bluntness and “one size fits all” approach reflected in the Court of Appeal’s construction.
38. And ultimately, if despite the statutory protections outlined above, IBAC considers that it cannot discharge its procedural fairness obligations with respect to a possible comment or opinion about a person without jeopardising the safety of another person, then there is

<sup>7</sup> See Part 6, and ss 43 and 45 in particular regarding the criminal offence of “detrimental action in reprisal”.

<sup>8</sup> See *Applicant VEAL of 2002 v Minister for Immigration and Multicultural and Indigenous Affairs* (2005) 225 CLR 88, [27]-[29] (the Court); *Chief Commissioner of Police v Nikolic* (2016) 338 ALR 683, [30] (Maxwell P, Osborn and Kaye JJA).

<sup>9</sup> Of course, information “cannot in all cases be clinically divorced from the context in which it appears”. See *SZTGV v Minister for Immigration and Border Protection* (2015) 229 FCR 90, [27] (Perram, Jagot and Griffiths JJ); *Plaintiff M7/2021 v Minister for Home Affairs* (2021) 95 ALJR 404, [35]-[36] (Gordon J).



no duty for IBAC to publish a report containing that comment or opinion at all. The duty prevails over the discretionary power. IBAC may still take other action under s 164.

## C.2 Construing s 162(3) so as to give effect to its purpose

39. The Court of Appeal considered that the evident purpose of s 162(3) was “to protect a person’s reputation from the publication in a special report of comments or opinions which are adverse to that person”, and reasoned that this was “achieved by giving a person an opportunity to respond to the proposed adverse comments or opinions before the special report is finalised and transmitted to Parliament”: **CA[137]**.
40. Allowing a person a fair opportunity to respond also serves the purpose of enhancing the accuracy, quality and value of special reports transmitted to Parliament, by ensuring that IBAC receives an informed response to a draft report.<sup>10</sup> That, indeed, may be seen as an important part of the rationale for affording a person procedural fairness.
41. However, these evident purposes of s 162(3) are undermined if the provision is construed in such a way that an affected person is not entitled to respond to the substance of the evidence on which that adverse comment or opinion is based. That is because compliance by IBAC with s 162(3) (so construed) may render a person unable to rebut the evidence on which the IBAC is provisionally minded to rely, so as to dissuade IBAC from including the adverse comment or opinion in a final report, unless IBAC happens to include all of that evidence in the draft report itself and that is given to the person.
42. At **CA[164]**, the Court of Appeal appeared mindful of the unattractiveness of a construction of s 162(3) that would only require IBAC to invite a person to respond to “adverse comments in bare, conclusionary form”. Thus, the Court sought to use the statutory requirement for “a reasonable opportunity to respond” to derive the conclusion that IBAC must “also provide any other contents of the draft report which discloses the basis upon which IBAC formed the adverse comments and opinions or which provide necessary context for them”. However, importantly, the Court maintained its position, driven by its construction of the expression “adverse material”, that any such “context” must be contained within the draft report itself.

<sup>10</sup> See *Woodman (No 1)* [2022] VSC 684, [68] (Ginnane J). Provision of the “adverse material”, understood as “the documents or information upon which the adverse comments or opinions are based”, “may enable the person to make an informed response, which is not only in their interests to make, but also in IBAC’s interests to receive, as it may lead to IBAC transmitting a more accurate and balanced special report”.

43. However, the Court’s attempt to thereby avoid the unattractive result of construing “the adverse material” to mean the adverse comment or opinion is flawed.
44. **First**, the Court’s approach tends to presume that a draft report, intended to be published under s 162(1), will in fact be prepared in a way that is sufficient to comply with an anterior duty under s 162(3). But there is no basis for such an assumption of fact. As Ginnane J held in *Woodman v Independent-Broad-based Anti-corruption Commission* (in a judgment from which IBAC did not seek leave to appeal), there is no reason to suppose that sufficient evidence to give a person a “reasonable opportunity” to respond to adverse comments will be included in a draft report.<sup>11</sup> It is merely a contingent possibility.
- 10 45. **Second**, insofar as the Court of Appeal was suggesting that there is some implied legal duty on IBAC, if it intends to exercise its discretionary power under s 162(1) to transmit a special report to parliament, to include in the draft sufficient information to enable a person who receives it under ss 162(2)-(4) to fairly respond, then that is wrong.
46. Section 162(1) controls the content of a special report. The report must relate to the performance of IBAC’s duties and functions. There is no requirement for a special report to have any particular requirement, including information that (when it was included in a draft of the report) would have facilitated compliance with an anterior procedural fairness duty in s 162(2)-(4). A report transmitted to Parliament is also public-facing: there is no basis to suppose that what IBAC may think appropriate to publish to the public in the exercise of its discretion under s 162(1) will correspond to what is necessary to discharge an anterior duty under s 162(2)-(4).
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47. The only way to ensure fairness is to construe s 162(3) as requiring IBAC to give an affected person the opportunity to comment on the substance of the adverse information or evidence on which IBAC relies in forming its provisional adverse comments or opinions about a person – whether or not, as a contingent fact, that is information that IBAC considers appropriate for inclusion in a public-facing report under s 162(1).
48. Finally, it could not be suggested that, on the Court of Appeal’s construction of “adverse material”, the words “reasonable opportunity” do the work of ensuring that an affected person receives sufficient information to enable them to fairly respond, because that

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<sup>11</sup> [2022] VSC 684, [71].

would undermine the very analysis that led to the Court’s narrow construction of the expression “adverse material”.

49. If discharging the duty to give a person a “reasonable opportunity” to respond to “adverse material” meant giving the person sufficient adverse information to enable them to fairly respond (irrespective of whether such information is, as a contingent fact, included in the draft report), then the Court’s rationale for construing “adverse material” as being confined to what is contained in the draft report itself evaporates (noting in particular the Court’s reliance on s 166 in that respect).

#### **D. CONCLUSION**

- 10 50. For the reasons outlined above, “adverse material” bears its well-recognised meaning in this area of law. In this way, s 162(3) may be seen as expressive of a recognised rule or incident of a duty of fairness that would otherwise have been ascertained by implication,<sup>12</sup> thereby avoiding debate as to whether that rule or incident is ousted or modified by the IBAC Act. And, contrary to the Court of Appeal’s reasoning, the appellants’ construction does not preclude any imperative to protect particular information in appropriate circumstances, and far better promotes the apparent purposes of the provision.

#### **E. ORDERS**

- 20 51. If this Court accepts the appellants’ construction of “adverse material”, and rejects that adopted by the Court of Appeal, then this Court should also conclude that the appellants are entitled to the relief sought in their notice of appeal, which includes declaratory relief and a writ of prohibition.
52. That is so even though, as IBAC sought unsuccessfully to emphasise at the special leave hearing, the primary judge properly construed s 162(3) of the IBAC Act but dismissed the appellants’ proceeding. It is as well to explain why.
53. The starting point is that the appellants appealed the primary judge’s orders on the basis that the primary judge should have found, but did not find, that IBAC had failed to comply with s 162(3) of the Act (ground 8 before the Court of Appeal). IBAC filed a notice of contention raising the issue of the construction of s 162(3), and the Court of Appeal

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<sup>12</sup> See *In re Pergmaon Press Ltd* [1971] 1 Ch 388, 400 (Lord Denning) and 407 (Buckley LJ); *National Companies and Securities Commission v News Corporation Ltd* (1984) 156 CLR 296, 315 (Gibbs CJ) and 324 (Mason, Deane and Dawson JJ).

disposed of the matter premised on its acceptance of IBAC’s construction: see **CA[164]-[176]**. It erred by doing so, and IBAC has not filed a notice of contention in this Court.

54. Insofar as it is useful to consider the primary judge’s reasons, his Honour’s analysis was erroneous in two obvious ways, despite according with the appellants’ construction of “adverse material”.

55. First, his Honour “concluded that IBAC can discharge its responsibilities by providing the plaintiffs with the opportunity to make a written response” (**PJ[173]**) and that this “right of response satisfies IBAC’s obligations under s 162(3)” (**PJ[176]**).

56. That conclusion emphasised that any response given under s 162(3) must be reflected in the final report. But that ignores the fact that a person should only be put in the position of responding under s 162(3) once IBAC has first disclosed what it is obliged to disclose under s 162(3).

57. Second, his Honour held that the draft report “does contain the substance of the adverse material upon which the adverse comments or opinions about the [appellants] contained in it were based” (**PJ[168]**). However, that is patently incorrect.

58. The draft report reveals, on its face, that IBAC has relied on material that was not disclosed to the appellants in forming adverse comments and opinions about them. See, for example:

58.1. [REDACTED]

[REDACTED] It is plain from this paragraph that IBAC relies on evidence of actual alleged conduct or events, which conduct or events has not been set out in the draft report or otherwise been disclosed to the appellants.

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58.2. [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED] Similar to above, it is apparent that IBAC relies on evidence of actual alleged conduct or events, that has not been set out in the draft report or otherwise disclosed to the appellants.

10 59. Similarly, in several locations in the draft report, adverse comments or opinions are purportedly supported by providing a quotation or paraphrase of a witness’s evidence, with little or no detail or context to the quotes relied upon.

59.1. [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED] The context derived from the adverse material which supports these adverse quotes is necessary to provide the appellants a reasonable opportunity to respond pursuant to s 162(3).

59.2. [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

[REDACTED]

[REDACTED] Such material would ensure the appellants are able to fairly respond.

59.3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Such material would ensure that the

appellants have a reasonable opportunity to respond to the adverse comments.

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60. The examples set out above demonstrate that, if the expression “adverse material” in s 162(3) is construed (as the appellants submit that it should) as being the information on which IBAC proposes to rely in including comments or opinions adverse to a person in a report, then IBAC has not complied with the duty. The extract of the draft report provided to the appellants did not contain all of the “adverse material”, and the IBAC has otherwise not provided it to them. The relief sought by the appellant should issue.

**PART VII ORDERS SOUGHT**

61. The appellants seek the orders in their notice of appeal.

**PART VIII ESTIMATE OF TIME FOR ORAL ARGUMENT**

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62. The appellants estimate that one hour and fifteen minutes will be required for the presentation of their oral argument.

Dated: 2 October 2023



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**IN THE HIGH COURT OF AUSTRALIA  
MELBOURNE REGISTRY**

**AB (A PSEUDONYM)**  
First Appellant

**CD (A PSEUDONYM)**  
Second Appellant

and

**INDEPENDENT BROAD-BASED ANTI-CORRUPTION COMMISSION**  
Respondent

**ANNEXURE**

**LIST OF STATUTORY PROVISIONS REFERRED TO IN SUBMISSIONS**

**Legislation**

**Version as at relevant date**

*Independent Broad-based Anti-corruption  
Commission Act 2011* (Vic) -ss 162,166

Current  
(Compilation 41 – 1 September  
2023)

*Public Interest Disclosure Act 2012* (Vic) –  
ss 43,45

Current  
(Compilation 26 – 1 December  
2021)