

Policy 02–08: Whistleblower

1 Purpose

The purpose of this policy is to support and protect individuals who disclose information about illegal or improper conduct within RISSB. This policy encourages individuals to come forward who are aware of possible wrongdoing and provides a safe and confidential environment where such concerns can be raised by individuals without fear of reprisal or mistreatment.

2 Scope

Unless otherwise stated or directed by RISSB this policy applies to and is binding on all people who perform work for RISSB as defined in Policy 02. It also applies to any spouse or dependent children thereof.

The policy sets out:

- who is entitled to protection as a Whistleblower under this policy;
- the protections Whistleblowers are entitled to under this policy; and,
- how disclosures made by Whistleblowers in accordance with this policy will be handled by RISSB.

The policy is available on the RISSB website under the information about RISSB tab.

This policy is subordinate to and is to be read in conjunction with Policy 02 Human Resources Management.

3 Policy Statement

RISSB is committed to the highest standards of conduct and ethical behaviour and seeks to promote a culture of compliance and good corporate governance.

RISSB recognises the important role Whistleblowers play in protecting the organisation, the community and in upholding the law. All people who perform work for RISSB who are aware of possible wrongdoing have a responsibility to disclose that information. RISSB guarantees that anyone who discloses perceived wrongdoing will be protected from adverse employment consequences. To affect that guarantee, RISSB has established a fair and impartial investigative process which provides protection for Whistleblowers.

Part 9.4AAA of the *Corporations Act 2001* (Cth) and Part IVD of the *Tax Administration Act 1953* (Cth) provide legislative protection for Whistleblowers.

4 Whistleblower Protection

Consistent with its obligations under the Corporations Act and the Tax Administration Act, RISSB has in place the necessary protections to protect Whistleblowers when a Whistleblower

comes forward to report a Wrongdoing. This includes providing a safe and secure means for reporting Wrongdoings and remedying any necessary matters arising from that report. RISSB will assist potential Whistleblowers in understanding what constitutes a Wrongdoing under this policy and has procedures in place to ensure that any reports are dealt with fairly and effectively.

To achieve this RISSB will take all necessary steps to ensure that when a person reports a Wrongdoing in accordance with this policy:

- their identity remains confidential according to their wishes to the extent permitted by law;
- they will be protected from any detrimental conduct including reprisal, discrimination, harassment or victimisation for reporting a Wrongdoing;
- any disclosures are dealt with effectively and efficiently;
- an independent internal, or where appropriate external, inquiry or investigation will be conducted;
- issues identified from the inquiry or investigation will be resolved or rectified; and
- the person will be informed about the outcome.

Should any detrimental conduct occur, RISSB will treat it as a serious Wrongdoing under this policy.

Throughout the process RISSB will seek to fulfil its legal obligations with respect to all matters dealt with in this policy while promoting an ethical culture within the organisation.

4.1 Definitions

Australian Whistleblower Laws:

Means either or both of the regimes contained in Part 9.4 AAA of the Corporations Act and Part IVD of the Taxation Administration Act 1953.

Eligible Recipient:

A person authorised by RISSB to receive disclosures of Wrongdoing under this policy and includes the Chair, CEO, any Director of RISSB, General Manager Corporate Services and Company Secretary, the Whistle Blower Governance Officer, and Moore Australia (RISSB's external provider).

Whistleblowing:

For the purpose of this policy, Whistleblowing is the disclosure by (or for) a witness of actual or suspected Wrongdoing.

Eligible Whistleblower:

An Eligible Whistleblower (Whistleblower) is defined as any person who discloses a Wrongdoing in accordance with this policy.

Whistleblower Governance Officer

The Whistleblower Governance Officer shall be an officer of the company separate from line management who will provide support to a Whistleblower including ongoing advice on the conduct and progress of any investigations.

Whistleblower Investigation Officer:

The Whistleblower Investigation Officer shall be an officer of the company nominated from time to time to conduct internal investigations into disclosures of Wrongdoing.

Wrongdoing:

Wrongdoing refers to a matter that a Whistleblower has reasonable grounds to suspect occurred.

Examples of Wrongdoing include, but are not limited to:

- breaches of any legislation, regulations or laws including by-laws;
- an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- breaches of RISSB's Policies, Codes and Procedures;
- dishonest or corrupt behaviour, including soliciting, accepting or offering a bribe, gifts, facilitation payments or other such benefits;
- fraudulent or serious impropriety;
- illegal activity (including theft, drug sale / use, violence or threatened violence and property damage);
- impeding internal or external audit processes;
- improper behaviour relating to accounting, internal accounting controls, actuarial, or audit matters;
- an activity that poses a risk to the environment or endangers health and safety;
- a conflict of interest including disclosure of confidential information;
- harassment, discrimination or bullying;
- conduct that perverts the course of justice or conceals improper or unethical conduct;
- a substantial mismanagement of RISSB's resources; and,
- conduct that is detrimental to RISSB's financial position or reputation.

4.2 Personal Grievances

It is important to note that Whistleblowing is not about airing a personal work-related grievance. A personal grievance does not usually qualify for protection under this policy unless it relates to systemic issues or involves a Wrongdoing. If a person is unsure as to whether a matter constitutes a Wrongdoing or is a personal grievance they should seek assistance from the General Manager Corporate Services and Company Secretary who can provide clarification.

Generally personal grievances relate to matters concerning the persons employment or interpersonal conflict and should be raised in accordance with RISSB's Complaints Management Policy, Discrimination and Sexual Harassment Policy or Bullying, Occupational Violence & Victimisation Policy.

4.3 Who May Disclose a Wrongdoing

All Whistleblowers are encouraged and have the responsibility to report any known or suspected incidences of Wrongdoing and are to be treated as Whistleblowers in accordance with this policy.

4.4 Who can a Whistleblower Disclose a Wrongdoing to?

A Whistleblower must disclose a perceived or alleged Wrongdoing to an Eligible Recipient. A form for the purpose of this disclosure is provided in the Appendix.

Where a Whistleblower, for whatever reason, is reluctant to disclose a Wrongdoing using the internal process outlined above or wishes to remain anonymous the Whistleblower may elect to disclose the Wrongdoing to RISSB's external provider Moore Australia, using the form provided in the Appendix. Contact details are provided in Section 10.

Whenever an Eligible Recipient receives a disclosure of alleged Wrongdoing, they are to provide advice to the RISSB Chair immediately who will advise Directors at the next Board Meeting or, where there is a significant risk to RISSB in either financial or reputational terms, as soon as possible. If the alleged Wrongdoing involves the RISSB Chair then the Chair of the Audit & Risk Committee should be notified.

Should the external provider or a Director receive a disclosure then they are to follow the same notification procedure.

It should be noted that a Whistleblower may also disclose a Wrongdoing to a legal practitioner for the purposes of obtaining legal advice in relation to the whistleblower provisions in the Corporations Act or the Tax Administration Act. Such disclosures are also protected.

4.5 What Happens When a Whistleblower makes a Disclosure

The identity of the Whistleblower will be kept strictly confidential unless:

- the Whistleblower consents to the disclosure of their identity;
- the disclosure of their identity is required by law; and/or,
- it is necessary to pass on information relating to the Wrongdoing to government regulators or the police.

By making a disclosure of Wrongdoing a Whistleblower will not be discriminated against or disadvantaged in any way in their employment or relationship with RISSB.

Whistleblowing is about reporting real or perceived improper conduct (Wrongdoing) and this policy seeks to encourage that. Importantly, a disclosure may damage the career prospects and or reputation of people who are the subject of allegations and therefore if a disclosure of Wrongdoing is not made on reasonable grounds, or is a deliberate vexatious or knowingly false disclosure then the person making the disclosure may be subject to disciplinary action including the termination of employment or of any service relationship.

To make a disclosure a Whistleblower can use the form provided in the Appendix to this policy. The form should be completed in as much detail as possible; however, should the Whistleblower wish to remain anonymous the name field can be left blank. Contact details however, such as a anonymised email address must be provided to ensure that the Whistleblower can be contacted. The form should be submitted to any Eligible Recipient. Once

lodged the Whistleblower will be notified by the Whistleblower Governance Officer that the disclosure has been received.

The disclosure will be assessed by the Eligible Recipient receiving the disclosure in consultation with the Whistleblower Governance Officer and where the conduct disclosed is deemed to be a Wrongdoing in accordance with this policy an investigation will be undertaken effectively and efficiently.

4.6 Roles, Rights and Responsibilities of Whistleblowers

Protection is available to Whistleblowers who disclose a suspected Wrongdoing.

Whistleblowers provide initial information related to a reasonable belief that a Wrongdoing may have occurred. The motivation of a Whistleblower is irrelevant to the consideration of the validity of the allegations.

Whistleblowers shall refrain from obtaining evidence for which they do not have a right to access. Such access may itself be considered an improper activity.

Whistleblower's making a report of alleged Wrongdoing should be prepared to set forth all known information regarding or supporting any reported allegations.

As outlined in section 4.5 Protection of the Whistleblower's identity will be maintained to the greatest extent possible within the legitimate requirements of the law and the investigation.

A Whistleblower can choose to remain anonymous throughout any investigation, however it is best if they maintain ongoing dialogue and communication with the WGO to ensure that all relevant information is provided. To protect the anonymity of the Whistleblower he or she may adopt a pseudonym and/or disclosures may be made through an anonymised email address, if the Whistleblower chooses to do so.

4.7 Whistleblower Governance Officer

The General Manager Corporate Services and Company Secretary is ordinarily (unless involved in the Wrongdoing) the Whistleblower Governance Officer (WGO) who will act as the first point of contact for anyone wishing to make a disclosure under this policy. The WGO will be advised of all disclosures of Wrongdoing and is responsible for protecting the Whistleblower from being victimised as a result of making the disclosure of Wrongdoing.

The WGO can protect the Whistleblower by offering the Whistleblower:

- counselling through the RISSB Employee Assistance Program; or,
- leave of absence (with pay) during the conduct of the investigation, if appropriate, in consultation with the Chair or Chair of the Risk & Audit Committee if the Chair is named in the disclosure,

The WGO is responsible for keeping the Whistleblower informed of the progress and outcomes of the inquiry/investigation subject to considerations of privacy of those against whom a disclosure has been made.

The WGO will ensure that all information provided as part of the disclosure including the results of any investigation is maintained in a secure location with access restricted in accordance with RISSB's Privacy Policy. Once the matter is resolved all files will be archived securely in RISSB's Sharepoint facility.

The WGO will maintain a register of all disclosures made by Whistleblowers and will report to the Remuneration & People Committee at each and every meeting on any disclosures made in accordance with this policy and on the outcomes of any investigations that have been undertaken including any actions taken as a result of those investigations.

4.8 Investigating Alleged Wrongdoing

Investigations of alleged Wrongdoing will be conducted in a manner that is confidential, fair and objective. The investigation processes will vary depending on the nature of the wrongdoing and the amount of information provided. Investigations will be undertaken by the Whistleblower Investigation Officer except in circumstances where the nature of the disclosure of Wrongdoing being made requires the specialist skills or independence of an external investigator. For a disclosure to be investigated, it must contain sufficient information to form a reasonable basis for investigation. This will be assessed in the first instance by the person receiving the disclosure and the person conducting the investigation.

In the event that a Whistleblower discloses a Wrongdoing to the External Provider the following process will be followed.

The External Provider will:

- notify the Chair of the relevant facts of the disclosure maintaining the confidentiality of the Whistleblower;
- notify the WGO of the disclosure and the name and/or contact details of the Whistleblower if that has been provided.

The Chair will undertake a preliminary assessment of the Wrongdoing disclosed and determine whether an internal or external investigation is to be undertaken.

A Whistleblower will always be informed of the outcome of the investigation. In cases where the Investigator has not substantiated the allegations, an appropriate explanation will be made to the Whistleblower, subject to any privacy and confidentiality rights.

Generally, where an investigation is conducted and the Investigator believes there may be a case to answer the Investigator must ensure that a person who is the subject of a disclosure:

- is informed of the substance of the allegations;
- is given a fair and reasonable opportunity to respond to the allegations before the investigation is finalised;
- has their response set out fairly in the Investigator's report; and,
- is informed about the substance of any adverse findings in the Investigator's report that affects them.

Where an Investigator's report makes adverse findings about an individual that individual has the right to respond before any action is taken by RiSSB.

4.9 Whistleblower Investigation Officer

The Finance Officer is ordinarily (unless involved in the Wrongdoing) the internal Whistleblower Investigations Officer (WIO) who will conduct the investigation of disclosures that are referred for internal investigation rather than externally. The WIO may seek the advice of external

experts in carrying out the investigation as required. The WIO will provide regular advice to the WGO on the progress of the investigation.

5 Whistleblower Protection and the Law

By making a disclosure in accordance with this policy a Whistleblower may be afforded protection under Australian Whistleblower Laws.

While this policy principally deals with internal disclosures of Wrongdoing, Australian Whistleblower Laws also protect some types of disclosure made to external parties (such as to legal representatives, the Australian Securities and Investments Commission (ASIC), to the Australian Commissioner of Taxation (ATO), members of parliament or journalists). Any person who is a Whistleblower under Australian Whistleblower Laws must be treated in accordance with, and is entitled to, the protections afforded by this policy.

For more information about these laws please refer to the ASIC and ATO websites as follows:

ASIC: <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/>

ATO: <https://www.ato.gov.au/General/Gen/Whistleblowers/>

6 Penalties for Breaches of the Law

The Corporations Act requires RISSB to provide protection to Whistleblowers including protection of their identity and protection from any detrimental conduct.

Failure to comply with the confidentiality and detrimental conduct provisions are criminal offences and subject to severe penalties. Breaches of confidentiality are treated as serious breaches of RISSB's Code of Conduct and Privacy Policy and may lead to disciplinary action including dismissal.

Whistleblowers may seek compensation from the courts where detriment has been suffered.

7 Responsibilities

The responsibilities under the Human Resources Management Policies including this policy are set out in Policy 02.

Additionally the:

Remuneration & People Committee is responsible for:

- reviewing the application of this policy and any disclosures of Wrongdoing made by Whistleblowers and reporting to the Board.

Chief Executive Officer is responsible for:

- ensuring that people who undertake investigations in accordance with this policy are properly trained.

Whistleblower Governance Officer is responsible for:

- assisting Whistleblowers who may wish to disclose a Wrongdoing in accordance with this policy; and
- reporting to the Remuneration & People Committee on disclosures, outcomes of investigations and any remedial actions.

Whistleblower Investigations Officer is responsible for:

- conducting investigations in accordance with this policy.

All people who perform work for RISSB are responsible for:

- Reporting any Wrongdoing in accordance with this policy.

8 Related Policies & Procedures

Policy 02:	Human Resources Management
Policy 02-02:	Code of Conduct
Policy 02-05:	Employee Welfare
Policy 02-06:	Discrimination and Sexual Harassment
Policy 02-07:	Bullying, Occupational Violence & Victimisation
Policy 02-09:	Complaints Management
Policy 03:	Risk Management
Policy 04:	Quality Management
Policy 06:	Privacy
Policy 08-01:	Social Media Use
Procedure:	Discrimination and Sexual Harassment
Procedure:	Complaints

9 Review and Continuous Improvement

The CEO is tasked with regularly reviewing the effectiveness of this policy to ensure RISSB's continued compliance with relevant legislation, and to ensure human resource outcomes align with the company's organisational goals.

This policy was approved by the Board at its meeting on 21 February 2024.

The policy will be reviewed not later than February 2026 in accordance with the Board's governance program as set out in the annual RISSB Board Calendar.

10 Further Information

Questions about this policy can be directed to the CEO, the Whistleblower Governance Officer or any of the other Eligible Recipients.

The Whistleblower Governance Officer is:

Ms Clare Stanwix
General Manager, Risk & Strategy & Company Secretary
E: cstanwix@rissb.com.au
M: 07 3724 0000

The Whistleblower Investigations officer is:

Ms Lyn Zeederberg
Finance Officer, RISSB
E: lzeederberg@rissb.com.au
M: 07 3724 0000

The external Eligible Recipient provider is:

Moore Australia
Attention Ms Robyn Speed, Partner
Level 12
10 Eagle Street
Brisbane QLD 4000
Telephone: 07 3340 3800
Email: robyn.speed@moore-australia.com.au

For assistance, support or further information, you may wish to contact the following organisations:

- Lifeline | www.lifeline.org.au | 13 11 14
- Beyond Blue | www.beyondblue.org.au | 1300 22 4636
- Employee Assistance Program | AccessEAP | www.accesseap.com.au | 1800 818 728

11 Appendix

Whistleblower Disclosure Form

Whistleblower Disclosure Form

This form is to be used if you wish to disclose a Wrongdoing.

In making this report you are doing so in accordance with the terms of the Whistleblower Policy (the Policy). Please read the Policy before lodging this report.

1. Tell us about yourself (optional)

Providing us with your personal information is voluntary, and you may choose to remain anonymous. However, providing your details will likely enhance and expedite the investigation. Your details will remain in confidence subject to the terms of the Policy. Please note contact details will still be required and may be anonymised if you wish to remain anonymous.

Name	
Contact Details	

I **consent** to the disclosure of my identity under the terms of this policy: **Yes** ☐ **No** ☐
(tick appropriate box)

2. Tell us what you are disclosing providing as much detail as you can

Provide a statement of the improper conduct	
Background to events, including dates, subjects and people involved.	
Do you have any documents that may assist us in assessing your concerns? If yes, please attach.	
Is there a financial sum involved and if so, how much?	
Have you, or another person you know of, started legal proceedings over this report?	

3. Tell us who you want to report

If the improper conduct is about a particular person(s), please include details below.

	Person 1	Person 2	Person 3
Title			
Given name			
Family name			
Work Address			
Work Title			
Email Address			
Telephone			
Mobile			
Describe their involvement in the matter			
Describe your connection with this person			

4. Confidentiality

This disclosure will remain confidential subject to the terms of the policy.

5. Submit this form

Please discuss the submission of this form with the Whistleblower Governance Officer if you are unsure as to who should submit this form to.

Alternatively the form can be submitted to any of the Eligible Recipients as set out in the policy.

6. What happens next

A review of your disclosure will be undertaken and an investigation initiated where this is deemed appropriate in accordance with the policy.

You will be informed as the matter progresses by the Whistleblower Governance Officer.