

WHISTLEBLOWER POLICY

PURPOSE

This Procedure sets out how RTL manages whistleblower disclosures and is to be read in conjunction with the RTL Code of Conduct.

The objectives of this Procedure are to provide clarity on how we support Whistleblowers so they:

- Know how to raise concerns and are aware of their rights and obligations, including the right to remain anonymous; and
- Feel safe in speaking up and raising concerns, free from detriment, retaliation or victimisation.

RTL is committed to complying with applicable laws for protection of Whistleblowers.

WHO IS A WHISTLEBLOWER?

For the purpose of this Procedure, a **Whistleblower** is a current or former:

- Director, Manager or Employee; or
- Contractor, consultant, supplier, service provider or associate (or their employees or subcontractors); or
- Any relative, dependent or spouse of any individual referred to above, who makes or attempts to make a disclosure, on reasonable grounds, about:
 - conduct that is contrary to the RTL Code of Conduct;
 - an improper state of affairs; or
 - a breach of the legislation set out in the Corporations Act 2001 (Cth) ('Act').

Personal work-related grievances may not be protected pursuant to this Procedure.

PROCEDURE

1. MAKING A DISCLOSURE

The Procedure applies where the Whistleblower makes the disclosure to an **Eligible Recipient**.

An Eligible Recipient includes:

- A person authorised by RTL to receive disclosures; and
- An officer, senior manager, auditor or actuary of RTL; and
- The RTL confidential third-party whistleblowing service (Ethics Line).

A disclosure may also be protected under the Act if:

- made to certain regulators or legal practitioners in the circumstances stated in the Act; or
- if it is a 'public interest disclosure' or 'emergency disclosure' made to journalists or parliamentarians, in certain circumstances where previous disclosure has been made to prescribed government bodies and as stated in the Act. Whistleblowers should contact an independent legal adviser before making a 'public interest disclosure' or an 'emergency disclosure'.

2. CONFIDENTIALITY AND ANONYMITY

The identity of the Whistleblower (or information disclosed that could lead to their identification), will be treated strictly confidentially and will not be shared unless:

- The Whistleblower has provided prior consent (in writing wherever possible or required); or
- We are compelled by law to do so; or
- We consider it appropriate to make a disclosure to a regulator under legislation.

We will comply with all requests for anonymity (subject to legal requirements) and make best endeavours to investigate the disclosure. There may however be practical limitations if a Whistleblower does not agree to share their disclosure or identity.

3. INVESTIGATION

Whistleblower disclosures will be referred to the Business Conduct Representative in RTL to perform a preliminary review of the allegations raised and commission an appropriate investigation.

All investigations will be conducted in a manner to ensure that the discloser will be kept informed, their details will be kept confidential, and investigations will be documented, and the outcome communicated to the discloser.

4. WORKPLACE PROTECTION OFFICER (WPO)

The Business Conduct Representative must inform the Workplace Protection Officer (WPO) of the matter. The WPO is responsible for safe guarding the interests of the Whistleblower by:

- Protecting the Whistleblower from retaliation;
- Maintaining the confidentiality of the Whistleblower; and
- Reviewing and considering any complaints of retaliation or any concerns that the disclosure has not been dealt with in accordance with the policy.

5. HOW ARE WHISTLEBLOWERS PROTECTED?

Whistleblowers have statutory protections under the Act in addition to the protections provided by RTL under this procedure. Protections under the Act may include identity protection, protection from detrimental acts or omissions, compensation and remedies and liability protections.

RTL will ensure fair treatment of Whistleblowers and does not condone any form of reprisal (disciplinary or retaliatory) being taken against anyone for raising or helping to address a concern. RTL will take all reasonable steps to protect Whistleblowers from such retaliation.

Whistleblowers will not be personally disadvantaged as a result of reporting. Examples of disadvantage include dismissal, demotion, harassment, discrimination, interference with their role or bias.

Whistleblowers who feel they have been disadvantaged as result of reporting should approach the WPO.

Any person who participates in any reprisal against a Whistleblower will be subject to disciplinary action, which may result in termination of employment or reference to an external authority.

RTL retains the right to manage personal work-related grievances with a Whistleblower. These are matters that arise in the ordinary course of their employment or engagement (i.e. a separate or unrelated performance or misconduct issue).

6. WORKPLACE PROTECTION OFFICER CONTACT DETAILS

Whistleblowers who feel they have been disadvantaged as a result of reporting should approach the WPO or delegates within RTL:

Company	Name	Role	Email
RTL	Michelle Robertson	Company Secretary	mrobertson@rtl.com.au
RTL	Owen Cavanough	General Manager	ocavanough@rtl.com.au

7. ETHICS LINE

The Ethics Line is administered by an external provider to provide an independent and safe avenue for reporting 24 hours, 7 days per week.

Company	Telephone (Free call)	Email
RTL	1300 304 550	rtl@stopline.com.au

RTL employees can also contact the Ethics Line via Online Disclosure Form, Post, Fax or App – STOP247. For details please visit <http://rtlmining.stoplinereport.com>