

# Whistleblower Policy

## Group Policy Document



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## Introduction

This Policy does not form part of any employment contract or other contract of engagement and may be changed by the Company at any time.

The current version of this Policy will be available on the Company intranet and on the website.

This Policy reflects the continued commitment of RGF Staffing APEJ and its related entities (the Company) to promoting ethical and responsible decision making and actions by our people. We expect all our people to behave ethically, lawfully and in accordance with Our Core Principles.

Unethical, unlawful or undesirable conduct is referred to in this Policy as “Misconduct”.

The purpose of this Policy is to:

- Promote an open and transparent culture within the Company;
- Identify and stamp out Misconduct;
- Encourage persons to report an issue if they have reasonable grounds to suspect that the Company or any officer, employee or agent of the Company has:
  - not behaved ethically,
  - has breached the law,
  - has not complied with our Code of Conduct or
  - has been involved in other misconduct, such as fraud or negligence or abuse of human rights;
- Provide a process for potential Whistleblowers to raise matters in the knowledge that the matters will be taken seriously and treated as confidential without the fear of reprisal or victimisation.

## Scope and application

This Policy applies to all reports of Misconduct (as defined by this Policy) relating to the Company or an officer, employee or agent of the Company.

This Policy does not apply to personal work-related grievances (such as an interpersonal conflict, decisions relating to promotions, decisions relating to terms and conditions of engagement, or decisions relating to suspensions and terminations of employment).

If this Policy differs from applicable law, the Company will apply the applicable law to the extent of any inconsistency. If you have any concerns about what is proper conduct, it is expected you will do the right thing and raise your concern with the appropriate Company representative; in most cases, your immediate manager is the best person.

## What constitutes misconduct?

Misconduct for the purposes of this Policy is any conduct that is unethical, unlawful, or improper, or the deliberate concealment of such conduct by the Company or any officer, employee or agent of the Company.

It includes circumstances where the Whistleblower has reasonable grounds to suspect:

- Financial irregularity, fraud or negligence;
- Corruption, bribery or similar behaviour within the meaning of the Company's Anti Bribery and Corruption Policy;
- Unlawfulness or illegality;
- Fraud or any improper state of affairs or circumstances in relation to the Company or another person or the tax affairs of the Company or another person;
- Endangerment of the health and safety of others or otherwise conduct that creates a danger to the public or financial system;
- Dishonest or other irregular dealings with customers and suppliers;
- Abuses of human rights including occurrences of modern slavery in the Company's operations or its supply chain;
- Any offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 or more months.

The Company encourages the reporting of all matters where there are reasonable grounds to suspect there has been Misconduct and the report is based on information that is directly known to the Whistleblower.

## Who may be a whistleblower?

Anyone who makes a report about Misconduct in accordance with this Policy is a Whistleblower. A report can be made anonymously. A person may make a report under this Policy if the person:

- Is or was an officer or employee of the Company, including those who are employed by the Company to work directly for customers and/or at customer sites;
- Is or was an unpaid work participant or other the Company site-based person. For example, work experience students, exchange workers, and employees of customers who work from a Company site;
- Is or was an associate of the Company as defined under the Corporations Act, such as any director or company secretary of the Company;
- Is or was a supplier, or employee of a supplier; including independent contractors of the Company;
- A relative or dependent of any individual referred to in any of the dot points above (this includes a spouse, parent, child, grandchild, and sibling).

# How to report

## Reporting to RGF Staffing APEJ

Reports should be made to a the RGF Whistleblower Protection Officer (WPO). Reports may be made anonymously.

Whistleblower Hotline: +61 2 9269 8600

Email: [whistleblower@chandlermacleod.com](mailto:whistleblower@chandlermacleod.com)

Post: RGF APEJ CHIEF WPO  
Level 5, 345 George Street  
Sydney 2000 NSW  
(marked Private & Confidential)

All reports received by phone, email or post (as listed above) are received by the Chief WPO who an independent member of the Risk and Compliance team.

An alternative WPO is the Company Secretary, contact details set out below:

Company Secretary: [COSEC@chandlermacleod.com](mailto:COSEC@chandlermacleod.com)

Reports may also be made to any Director or Senior Manager of the Company.

## Reporting outside Chandler Macleod Group

In the event you wish to report Misconduct to a person other than the Company, you can make a report to:

- An auditor of the Company
- The Australian Taxation Commissioner or a registered tax agent or BAS agent (for the case of tax related matters only);
- The Australian Securities and Investments Commission;
- The Australian Prudential Regulation Authority;
- The Australian Federal Police;
- A legal practitioner.

## Confidentiality and anonymity

All reports of Misconduct made under this Policy will be treated in a manner that is confidential. The Company will not reveal your identity unless you have provided consent or it is required by law, for example, if the Company is required to disclose your identity to the Australian Federal Police, or to allow the Company to obtain legal advice. Reports received anonymously are accepted.

# Protection and support

## **Protection against victimisation**

the Company is committed to providing a fair, supportive and protected process for all Whistleblowers. The Company will ensure that measures are taken to protect you even if any report you make in accordance with this Policy is subsequently determined to be incorrect or is not substantiated.

Reprisals or threats of reprisals will not be tolerated by the Company. The Company will not, and will ensure that its officers, employees and agents will not terminate, demote, suspend, threaten, harass or in any other manner discriminate or engage in detrimental conduct against an eligible Whistleblower because of a report under this Policy. Any the Company officer, employee or agent who retaliates against an actual or potential Whistleblower, or other party involved in the process of reporting any Misconduct in accordance with this Policy, will be subject to disciplinary action. Our people are reminded that in certain circumstances, victimisation of Whistleblowers can constitute a criminal offence.

It is important for you to be aware that, in addition to this Policy, certain statutory protections and private rights are available to Whistleblowers under Australian legislation.

## **Support and Welfare**

The Company treats people's wellbeing as a priority. If you make a report to a WPO, the WPO will discuss with you and take appropriate measures to ensure you are supported during the reporting and investigation process.

Employees and their family members have access to our Employee Assistance Program (EAP) a confidential and professional counselling and support service.

# How We investigate

All reports of Misconduct will be treated seriously and will be fully investigated. Investigations will be independent of any person(s) or business unit who is the subject of the report.

Investigations will be undertaken by a WPO, any delegate of the Company approved by a WPO or by a third party. For example, external legal, tax or accounting advice may be required to assist in the investigation.

Where investigations substantiate an allegation, the matter will be dealt with in accordance with established administrative or disciplinary procedures. This may result in disciplinary action, including termination of employment for the person(s) involved.

Any matters of a criminal nature will be reported to the police and, if appropriate, other appropriate regulatory authorities. The WPO will inform you of the outcome of the investigation, where it is appropriate.

### **Disciplinary Action**

There will be no disciplinary action against you if your report was made in accordance with this Policy but is unable to be substantiated or is found to be untrue. You may be subject to internal disciplinary action if you are implicated in the Misconduct you report.

## **Fair treatment**

The Company recognises that its employees who are involved in matters that are the subject of a report may also need support.

The Company and the WPO will not disclose the identity of any individual who may be involved in the subject matter of a report, except as required by the assessment and investigation process and except as set out in this Policy.

The Company will take steps so that at the appropriate time individuals who are involved in or directly affected by the report are:

- Informed of the substance of the allegation(s);
- Given a fair and reasonable opportunity to answer the allegation(s) before a final decision is made;
- Informed as to the substance of any adverse comment that may be included in a report arising from the investigation;
- Able to include their response in the investigator's report.

## **Related policies**

- Code of Conduct Policy
- Anti-Bribery and Corruption Policy
- Complaints & Grievances Policy
- Conflict of Interest Policy
- Discipline & Misconduct Policy
- Group Accounting Policy
- Occupational Health & Safety Policy
- Governance Policy
- Modern Slavery Statement
- Human Rights Statement
- Tax Compliance and Corporate



# Document Control

Version	Author	Changes	Date	Approver	Date Valid
V4.1	Risk Manager	Re-brand only	01/04/2022	CEO/CFO	01/08/2021
V4.0	Risk Manager	Various updates	28/07/2021	CEO/CFO	01/08/2021
V3.0	Risk Officer	Incl PB	04/09/2019	EGM Legal	04/09/2019
V2.0	Legal & Risk	General review	01/11/2018	EGM Legal	15/11/2019
V1.0	Legal & Risk	Create	June 2018	EGM Legal	01/06/2018

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