

# Whistleblower Policy

## Group Policy Document

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# Introduction

RGF Staffing ANZ is a group of entities (including Chander Macleod, ahs Hospitality, Aurion Corporation, Peoplebank Limited and Vivir Healthcare) referred to from here on in as 'The Company' 'we' 'us' and 'our' who is part of a Global network of subsidiaries, owned by Recruit Global Holdings.

This Whistleblower Policy outlines the circumstances under which a person may make a Protected Disclosure in relation to the Company or any company in association with us, regarding improper conduct, which includes breaches of law, breaches of the Code of Conduct, financial malpractice, dishonesty, concerns about human rights and/or unethical behaviours.

The Policy explains how to make a Protected Disclosures and outlines the support and the protections that are available. Nothing in this Policy is intended to obstruct any person from reporting possible violations of law or regulation to any governmental agency or entity.

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; An up to date copy of this policy is available on the Company intranet and our Website.

## Purpose

The purpose of this Policy is to:

- Promote an open and transparent culture;
- Publish our commitment, that no retaliatory action will be taken against a person for making a Protected Disclosure.
- Identify and eliminate Misconduct;
- Provide a confidential 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;
- Encourage persons to report any issue if they have reasonable grounds to suspect that the Company or any officer, employee, partner, supplier or agent associated with the Company has:
  - not behaved ethically,
  - breached any law,
  - not complied with our Code of Conduct or
  - been involved in other misconduct, such as fraud or negligence or
  - been involved in a violation of human rights including those relating to modern slavery;

## Scope and application

This Policy applies to all Directors, officers, employees, contractors and volunteers (our workforce), community members affected by our operations and workers in our supply chain and applies to the reporting of serious misconduct as outlined in this Policy. This policy also applies to matters that, in accordance with the Australian Corporations Act meet the Protected Disclosure definition.

If a report is made through the Whistleblower channel and it does not meet the Whistleblower criteria, we will ensure that the matter is effectively managed through one of our other grievance channels and reporters can be assured that the same respect and confidentiality commitments apply across our various reporting channels.

Where this Policy is found to differ from applicable law, the Company will apply the applicable law to the extent of any inconsistency.

## What constitutes serious misconduct?

For the purposes of this Whistleblower policy, serious misconduct relates to any circumstances where an individual has reasonable grounds to suspect, or is directly impacted by, or has possession of information that the company, or any of its workforce or associates, is engaging in conduct that:

- breaches any laws of any jurisdiction in which the company operates;
- involves corruption, bribery, fraud, dishonesty or other unethical or irregular behaviours;
- endangers the health and safety of others;
- represent a danger to the public or any financial system;
- results in abuses of human rights, including harassment of any kind (including sexual harassment), discrimination of any kind, modern slavery or any action that attempts to limit an individual's freedom;

### Additional information about human rights violations covered by this policy

We respect internationally recognised human rights including those set out in the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights (collectively the International Bill of Human Rights) and the ILO Declaration on Fundamental Principles and Rights at Work.

In circumstances where an individual has reasonable grounds to suspect or has experienced:

- **Modern Slavery** including forced labour, servitude, debt bondage child labour, trafficking, forced marriage;
- **Harassment** meaning any unwelcomed behaviour (including of a sexual nature) that:
  - offends, humiliates, discriminates or intimidates a person and/or
  - that a reasonable person could anticipate may make another person feel offended, humiliated or intimidated in that situation

regardless of the intentions of the alleged harasser.

## Who may be a whistleblower?

Any individual who makes a report about serious misconduct or human rights violations in accordance with this Policy is deemed a Whistleblower by the Company.

To meet the legal definition of a Whistleblower and to be eligible for legal protections related to Protected Disclosures, You **must** be:

- a current or former employee, officer, supplier, or associate of the organisation (and/or its related entities and/or associates), that your disclosure is about,  
Note: this can be either paid or unpaid, and can include volunteers or
- a trustee, custodian or investment manager of a superannuation entity, or an officer, employee or goods/ service provider to a trustee, custodian or investment manager, or
- a spouse, relative or dependant of one of the people referred to above, or a dependant of such an individual's spouse. (For example, a parent, child, grandchild, sibling)

While you must hold or have held one of these roles to access the protections, you do not have to identify yourself or your role, and you can raise your concerns anonymously.

If you are unsure about what serious misconduct is, or, what a Protected Disclosure is, please discuss this with the appropriate Company representative; in most cases, your immediate manager is the best person; For those who are not directly employed by us, or where further clarifications are required, enquiries may be raised directly to the Whistleblower channel.

# How to make a whistleblower report

**IMPORTANT NOTE: A WHISTLEBLOWER REPORT CAN BE MADE ANONYMOUSLY.**

Whistleblower reports can be made to any of the following:

- **The Company:** including to a director, company secretary, company officer, or senior manager, directly to our Whistleblower Protection Officer. See Direct Reporting Details below.
- **To headquarters (HQ) or an actuary** of the company. See HQ Reporting Details below.
- **an external auditor** of the company, via their own reporting channels.
- **Externally:** to the Australian Securities and Investments Commission, the Australian Prudential Regulation Authority, the Slavery Commissioner or Australian Border Force (for matters related to Modern Slavery), the ATO or a registered Tax agent / BAS agent (for tax related matters), the Human Rights Commission (for violations relating to internationally recognised human rights), the Australian Federal Police and/or your lawyer, if disclosing to obtain legal advice or representation relating to a disclosure.

## DIRECT REPORTING DETAILS

Reports can be made directly to the Whistleblower Protection Officer of the Company via the following channels:

1. Phone – Whistleblower Hotline [+61 2 9269 8600](tel:+61292698600)
2. Email - [whistleblower@rgfstaffing.com.au](mailto:whistleblower@rgfstaffing.com.au)
3. Online report form
4. Post - RGF ANZ CHIEF WPO  
Level 13, 345 George Street  
Sydney 2000 NSW  
(marked *Private & Confidential*)

Reports can also be made:

- Directly to the Company Secretary at: [COSEC@rgfstaffing.com.au](mailto:COSEC@rgfstaffing.com.au)
- Or to any Director, Officer or Senior Manager of the Company; if you chose to use these channels, please ensure you make clear in your correspondence, that your matter is being raised under our Whistleblower Policy.

## HQ REPORTING DETAILS

If you are directly employed by us, You can make a report to Headquarters via the link: [RGF Staffing HQ Whistleblower hotline](#) published on our internal intranet site.

## **Confidentiality and anonymity**

All/any Whistleblower reports 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**

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

Reprisals or threats of reprisals will not be tolerated. 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 Company officer, employee or agent who retaliates against an actual or potential Whistleblower, or other party involved in the process of whistleblower reporting in accordance with this Policy, will be subject to disciplinary action, up to and including termination of employment or the commercial or other arrangements we may have in place.

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 privacy rights are available to Whistleblowers under Australian legislation.

### **Support and Welfare**

People's wellbeing is a priority of the Company and as such we will discuss with you and take appropriate measures to ensure you are supported during the reporting and investigation process. Including warm introductions to support services where appropriate.

Our direct 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 whistleblower reports are investigated in accordance with our “Management of Whistleblower Cases Procedure”, designed to ensure:

- Respect and confidentiality for all involved,
- Impartiality and fairness (including the opportunity to respond to allegations made throughout the investigations)
- Thorough and detailed investigation including involvement of external experts as appropriate,
- Clear and constant communication with relevant stakeholders as appropriate
- Escalation to appropriate levels / external authorities as may be appropriate or required.

Initial investigations are undertaken by our WPO, who may assess that involvement of a third party is required; for example, external legal, tax or accounting advice, may be required to assist in the assessment of a matter raised.

Where the investigations substantiate an allegation, the matter will be dealt with in accordance with established legal, administrative and/or disciplinary procedures. This may result in disciplinary action, including termination of:

- employment for the person(s) involved and or
- commercial arrangements / associations we may have in place with other organisations.

Matters of a criminal nature will be reported to the police and, if appropriate, other related regulatory authorities. The WPO will inform relevant stakeholders of the outcome of the investigation, where it is appropriate to do so.

## Disciplinary Actions

There will be no disciplinary action against a Whistleblower where the report is made in accordance with this Policy, even if it is unable to be substantiated or is found to be untrue. A person making a report may still be subject to disciplinary actions outlined in our Code of Conduct and our disciplinary procedures, if they are implicated in the matter they report.

## Fair treatment

We recognise that our employees who are involved in matters that are the subject of a report may also need support. We 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, the investigation process and except as set out in this Policy.

Individuals who are involved in or directly affected or named in a report will, before a final decision is made, be:

- Informed of the substance of the allegation(s);
- Given a fair and reasonable opportunity to respond to allegation(s);
- 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 Compliance Policy

# How to raise a Whistleblower report (Internal)



1

Can you discuss your concerns with the person involved?

If yes, do so!

If you cannot because you feel not comfortable about it, or you have tried this earlier but without any result, go to option 2.

2

Can you discuss the concern with your line manager, confidential counsellor, or local Risk / P&C representative?

If yes, do so!

If this is not an option, for instance because the concern relates to your line manager, or there is no confidential counsellor, go to option 3.

3

Can you report your concern through the RGF Staffing ANZ (anonymous) Whistleblower channel or equivalent?

If yes, use these buttons!



Call +61 2 9269 8600



Send an e-mail to [whistleblower@rgfstaffing.com.au](mailto:whistleblower@rgfstaffing.com.au) to file a report

4

If the above options are not appropriate for you then we recommend that you report your concern through the (anonymous) RGF Staffing HQ Whistleblower Hotline



Report here via the [RGF Staffing HQ Whistleblower hotline](https://www.rgfstaffing.com/hotline)



Send an e-mail to [compliance@rgfstaffing.com](mailto:compliance@rgfstaffing.com) to file a report



We know that raising your concern or filing a Whistleblower report is not easy. Remember that RGF Staffing commits to taking your concern seriously, whatever it may be, and to always handle it appropriately.

# Document Control

Version	Author	Changes	Date	Approver	Date Valid
V8.0	Group Risk & Compliance Manager	Review, expand policy application and update branding.	30/07/2024	CEO	01/08/2024
V7.0	Risk Manager	Include specific Harassment references	08/03/2023	CEO	01/08/2023
V6.0	Risk Manager	Human Rights / HQ Chanel	01/07/2022	CEO	05/10/2022
V5.0	Risk Manager	Corrections (minor)	04/04/2022	CEO/CFO	04/04/2022
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

## **RGF Staffing ANZ**

Level 13, 345 George St, Sydney, NSW 2000

GPO box 2212, Sydney, NSW 2001

T +61 (02) 9269 8666

[info@rgfstaffing.com.au](mailto:info@rgfstaffing.com.au)

[www.rgfstaffing.com.au](http://www.rgfstaffing.com.au)