

# **Ethics (Whistleblower) Hotline Policy**

## 1. Purpose

The purpose of this policy is to:

- 1. Describe each individual's responsibilities, as well as our practices as an organisation, regarding the reporting of violations of law and breaches of our code of conduct
- 2. Inform individuals about their options for communicating instances of wrongful conduct
- 3. Create an environment where individuals feel encouraged to raise reports and make disclosures in a timely, safe and confidential manner
- 4. Assure individuals that they will not experience retaliation as a result of having made a good faith disclosure
- 5. Actively protect and manage the welfare of whistleblowers and others connected with a report and/or disclosure

## 2. Scope

This policy applies to all RedR personnel:

- a. All current and former employees, board members, volunteers, contractors and interns/work placements of RedR,
- b. RedR current and former deployees, and
- c. Standby personnel/applicants.

# 3. Policy Statement

Achieving our mission requires that the people who work here be honest, law-abiding, respectful, fair and decent individuals. While our code of conduct describes specific principled behaviour that is required, it doesn't attempt to make rules for everything. It is up to each one of us as individuals to understand our core values and apply them to our unique assignments; when we're not sure about a decision, it's our responsibility to contact our CEO or someone in the HR Office for guidance.

It is in our organisation's best interest to know of any legal or code of conduct violations as early as possible. When we learn about problems, action can be taken to stop the wrongful acts. Addressing problems forthwith not only reduces the negative impact of the error, but also assures that our reputation remains strong, putting us in the best stead to achieve our mission.

We intend to take the necessary action to prevent ethical lapses, and to swiftly correct failure to follow the law and our code of conduct.

Nothing in this policy is intended to interfere or negate information in the Employee Handbook

## 4. Principles

## 4.1 Responsibility

It is the responsibility of each individual to communicate activity which may be a violation of:

- •the laws which govern our work, or
- •our code of conduct



An allegation of wrongful conduct must be made with the individual having reasonable grounds of their suspicion.

RedR Australia executives, senior managers or team leaders can be in receipt of a whistleblower report and/or disclosure of wrongful conduct/misconduct. The recipient must ensure the protection of the whistleblower. Importantly, the recipient of a report/disclosure is obliged to proactively protect the whistleblower from the risk of detrimental action.

As outlined below, there is a reporting process available to assist those who have knowledge that would be useful to our organisation. Each individual must take seriously their obligation to communicate knowledge of wrongful behaviour. We also expect individuals to challenge openly and in-the-moment any actions that violate the spirit of our values and our code of conduct, regardless of the status of the person whose questionable behaviour is being addressed.

#### 5. Procedures

## 5.1 Our whistleblower and reporting practices and options

RedR Australia would like all its personnel to feel safe and to be treated fairly at work, so if you believe that you or a work colleague are unsafe or not being treated fairly and your manager cannot assist, RedR Australia wants you to feel confident in reporting what is wrong to our independent hotline service at Stopline.

Stopline has trained and experienced consultants available to take your telephone call, letter, email or website about your complaint.

Stopline takes information about illegal, corrupt or unfair behaviour in the workplace and you can remain anonymous. There is no caller ID on the telephone calls to Stopline and any electronic form of communication is also confidential.

Stopline will handle your information in a secure and confidential way. Stopline's Privacy Policy can be found at <a href="https://www.stopline.com.au/privacy-policy">https://www.stopline.com.au/privacy-policy</a>.

You can email Stopline at <a href="mailto:redraustralia@Stopline.com.au">redraustralia@Stopline.com.au</a> or telephone 1300 30 45 50 between the hours of 8am and 9pm or write to Stopline at PO Box 175 Hawthorn East, Victoria, Australia 3122.

You can also use the confidential website at <a href="www.redraustralia.stoplinereport.com">www.redraustralia.stoplinereport.com</a> to find out more information or report an incident. You can also download the free smart phone APP and make a confidential disclosure.

When you contact Stopline please include details of your complaint, including;

- What is happening?
- > Where it is happening?
- > How it is happening?
- > Who is doing the wrong thing?
- Why they are doing the wrong thing?

RedR Australia and Stopline want you to be confident to report any wrong or unfair behaviour at work.

## 5.2 What the Submitter Can Expect

Regardless of the manner in which issues are reported, individuals who make a submission are protected from detrimental action. All reports and investigations pertaining to those reports, will remain confidential and those recipients that receive such reports are warned that any release or disclosure of an individual's personal details will result in RedR Australia enforcing disciplinary action. Further to this, an individual may receive a civil or criminal penalty if the whistleblower laws are breached.



If an individual does not believe the action taken by whom they have reported the wrongful conduct to was suitably effective, the individual is entitled to report the matter to the RedR Australia Fraud Control Unit or the P & C Director.

If the submitter elects anonymity, the company will do its best to keep the submitter's identity anonymous.

## 6. Compliance, monitoring and review

The RedR Fraud Control Unit is responsible for ensuring the policy:

- Aligns with relevant legislation, government policy and /ACFID and RedR requirements/strategies/values,
- Is implemented and monitored, and
- Is reviewed to evaluate its continuing effectiveness

## 7. Definitions

Wrongdoing, wrongful conduct	A violation of applicable state and/or federal laws and	
	regulations A violation of our Code of Conduct	
	<ul> <li>Behaviour which, if not ceased, could lead to a legal or code- of-conduct violation</li> </ul>	
	Actions which are not in keeping with our values in general	
Detrimental Action	<ul> <li>Action causing injury, harm, loss or damage (including psychological harm);</li> </ul>	
	<ul> <li>damaging a person's property, reputation, business or financial position or causing any other damage to a person;</li> </ul>	
	Intimidation, bullying or harassment;	
	<ul> <li>Discrimination or other adverse treatment in relation to the Whistleblower's employment, career, profession, trade or business, including dismissal, demotion or the taking of other disciplinary action;</li> </ul>	
	Current or future bias;	
	<ul> <li>Action that constitutes the making of a threat to cause any such Detrimental Action to another person; or</li> </ul>	
	<ul> <li>Any conduct which incites others to subject the Whistleblower to any of the above conduct.</li> </ul>	

## 8. Document control

Reviewed by:	Marsh
Approved by:	CEO



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