



# Whistleblower Policy

## CONTENTS

1. Purpose .....	2
2. Who this policy applies to.....	2
3. Disclosable Matters .....	3
4. How to disclose concerns about a Disclosable Matter .....	4
5. Investigations .....	7
6. Protection & Support .....	9
7. Group Reporting Procedures and Governance .....	11
8. Consequences of Breach.....	12
9. Questions .....	12
10. Distribution of Policy.....	12
11. Review.....	12
Appendix 1 - Definitions: .....	13
Appendix 2 – Contact Details for reporting channels.....	15

Owner	Board of Directors
Policy (including changes) approved by	Board of Directors
Direct questions on Policy to	Company Secretary
Publication	All RFG Workplace Participants/Public
Status	Approved & Adopted

*RFG reserves the right to modify, replace or cancel this Policy at any time. All location specific policies, procedures, statements and forms should be read in conjunction with all policies available on the RFG intranet or equivalent communication tool. Please contact your HR representative for further information or if you have queries about this Policy at any point in time. This document is uncontrolled when printed.*

## 1. Purpose

*RFG* is committed to fostering a culture of ethical behaviour, corporate compliance and risk management.

Speaking up is a critical component of our values and it is important that you feel safe when doing so.

This *Policy* aims to provide clarity on how *RFG* supports you so that you:

- are encouraged to make reports to which this *Policy* applies;
- know how to make reports to which this *Policy* applies;
- know what will happen when you make a report under this *Policy*; and
- feel safe about making a report under this *Policy*.

We will support you throughout making a report under this *Policy*, and do not tolerate any form of retaliation or victimisation as a result of you speaking up in accordance with this *Policy*.

Under the *Whistleblowing Legislation*, *Whistleblowers* are given protections in relation to certain types of disclosures. To qualify for these protections, a *Whistleblower* must:

- be an *Eligible Whistleblower* (a list of whom, for *RFG*, is set out in section 2 of this *Policy*);
- be reporting on a *Disclosable Matter* (a list of which is set out in section 3.1 of this *Policy*); and
- make their report directly to an *Eligible Recipient* (a list of whom, for *RFG*, is set out in section 4.1 of this *Policy*).

Section 6 of this *Policy* contains a summary of those protections under the *Whistleblowing Legislation*.

This *Policy* operates in conjunction with other policies or codes adopted by *RFG* relating to standards of behaviour and conduct. It is subject to change at *RFG*'s discretion, and does not form part of any contract of employment, industrial instrument or commercial contract or agreement.

Where there is any inconsistency between this *Policy*, other policies or individual agreements, then the terms of this *Policy* prevails. In the case of inconsistency between this *Policy* and the law, the law prevails.

## 2. Who this policy applies to

The following are eligible to make reports under this *Policy*:

- an officer of *RFG* (which includes *Directors* and the *Company Secretary*);
- an *Employee* or *Seconded*;
- an individual who supplies services or goods to *RFG*;
- an employee of a supplier of services or goods to *RFG*;

- an individual who is an associate of *RFG*;
- a relative of an individual listed above;
- a dependant of any individual listed above or of their spouse; or
- someone who was formerly any of the above (e.g. a former *Employee*).

Under the *Whistleblowing Legislation*, each of these is an *Eligible Whistleblower*.

### 3. Disclosable Matters

#### 3.1 What is a Disclosable Matter

If you have reasonable grounds to suspect that you have information concerning:

- misconduct (which includes fraud, negligence, default, breach of trust and breach of duty) or an improper state of affairs in relation to the *Group* (which includes a breach of legislation, including the *Corporations Act*, an offence against the Commonwealth punishable by imprisonment for 12 months or more, or conduct that represents a danger to the public or financial system); or
- misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of *RFG* or an associate of *RFG* (*Tax Disclosures*),

then this is a *Disclosable Matter* under this *Policy* and the *Whistleblowing Legislation*.

Some examples of conduct which should be reported under this *Policy* include:

- corrupt, fraudulent or other illegal conduct or activity;
- conduct involving substantial risk to public health and safety, the environment or to the stability of, or confidence in, the financial system (even where that conduct does not involve a breach of a particular law);
- insider trading, insolvent trading, breach of the continuous disclosure rules, failure to keep accurate financial records, falsification of accounts, misleading and deceptive conduct, market manipulation;
- failure of a *Director* or other officer of the *Group* to act with the care and diligence that a responsible person would exercise or to act in good faith in the best interests of *RFG* or failure of a *Director* to give notice of any material personal interest relating to *RFG's* affairs; or
- any other kinds of serious impropriety.

#### 3.2 What is not a Disclosable Matter

To avoid doubt, *Disclosable Matters* do not include personal work related grievances. Information relating to these matters may not be covered by this *Policy* or the *Whistleblowing Legislation*.

These are generally grievances relating to a *Workplace Participant's* current or former employment or engagement (or that of their relative or dependent who is a *Workplace Participant*) that have implications for that person personally, and that do not have broader implications for the *Group*. Examples may include:

- interpersonal conflicts between *Workplace Participants*;
- a decision relating to employment or engagement, such as a transfer, promotion or disciplinary action;
- a decision relating to the terms and conditions of employment, including remuneration; or
- a complaint of bullying, harassment, discrimination or other unfair treatment.

A personal work related grievance may, however, still qualify for protection under the *Whistleblowing Legislation* if:

- it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- a *Group* member has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond a *Workplace Participant's* personal circumstances;
- the *Whistleblower* suffers from or is threatened with detriment for making a disclosure; or
- the *Whistleblower* seeks legal advice or legal representation about the operation of the protections under the *Whistleblowing Legislation*.

*Disclosable Matters* will not include disclosures assessed to fall outside the scope of this *Policy*.

*Whistleblowers* are, therefore, encouraged in the first instance to use normal business channels for issues relating to their own personal circumstances (e.g. employment matters), or where normal business procedures exist, except where the *Whistleblower* believes they may suffer personal detriment or wish to use the protections under this *Policy*.

### **3.3 Duties of Workplace Participants in relation to Disclosable Matter**

*Workplace Participants* who become aware of, or suspect on reasonable grounds that, a *Disclosable Matter* has occurred will be expected to make a report under this *Policy* or under other applicable policies.

## **4. How to disclose concerns about a Disclosable Matter**

### **4.1 Channels for disclosure**

Disclosures under this *Policy* can be made to any of the following:

- any officer or senior manager of the *Group* whose details are set out in Appendix 2 of this *Policy* (each an *RFG Eligible Recipient*);
- *RFG's* auditor (including a member of the audit team); or
- any independently managed whistleblower hotline service maintained by the *Group* from time to time.

*Tax Disclosures* in relation to the *Group* may also be made to:

- the registered tax agent or BAS agent for the *Group*. As the date of this *Policy*, RFG's registered tax and BAS agent is KPMG; or

any other *Employee* or officer of the Group who has functions or duties relating to the tax affairs of the group (e.g. an internal accountant). You may also disclose *Disclosable Matters* to ASIC, APRA or (for *Tax Disclosures*) the Commissioner of Taxation.

Nothing in this *Policy* prevents you from making a disclosure to, providing information to, or communicating with regulators, authorities or law enforcement agencies in accordance with any law, regulation or standard that applies. This may include making public interest or emergency disclosures of a *Disclosable Matter* to a journalist or a parliamentarian where each of the following criteria is satisfied respectively:

Public interest disclosure	Emergency disclosure
at least 90 days have passed since the <i>Eligible Whistleblower</i> made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation	the <i>Eligible Whistleblower</i> made the disclosure to ASIC, APRA or other prescribed government body;
the <i>Eligible Whistleblower</i> does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;	the <i>Eligible Whistleblower</i> has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
the <i>Whistleblower</i> has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and	before making the public interest disclosure, the <i>Eligible Whistleblower</i> has given written notice to the regulatory body to which the previous disclosure was made that: <ul style="list-style-type: none"> <li>includes sufficient information to identify the previous disclosure; and</li> <li>states that the <i>Eligible Whistleblower</i> intends to make an emergency disclosure; and</li> </ul>
before <i>making</i> the public interest disclosure, the <i>Eligible Whistleblower</i> has given written notice to the regulatory body to which the previous disclosure was made that: <ul style="list-style-type: none"> <li>includes sufficient information to identify the previous disclosure; and</li> <li>states that the <i>Eligible Whistleblower</i> intends to make a public interest disclosure.</li> </ul>	the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

If any of the above criteria is not met, your report will not be a protected under the *Corporations Act* and you may incur civil or criminal liability for disclosing the information in your report. RFG strongly encourages you to obtain independent legal advice to ensure that you understand the above criteria before you consider making a public interest or emergency disclosure.

## 4.2 Legal advice

You may also qualify for protection under this *Policy* and the *Whistleblowing Legislation* if you disclose a *Disclosable Matter* to a qualified legal practitioner for the purposes of obtaining legal advice or representation in relation to this *Policy* or relevant whistleblower laws, even in circumstances where the legal practitioner concludes that a disclosure does not relate to a *Disclosable Matter*.

### 4.3 Providing information

*Whistleblowers* must only make reports under this *Policy*, and will only be entitled to the protections under it and the *Whistleblowing Legislation*, if they have reasonable grounds to suspect that the information they are reporting concerns a *Disclosable Matter* (even if the information turns out to be incorrect).

In order that *Whistleblower Disclosures* may be properly investigated, they must contain enough information to form a reasonable basis for investigation. *Whistleblowers* are therefore requested to provide as much information as possible. This includes:

- your name and contact details. If your report is anonymised, you can include an anonymised email address *RFG* can contact you at (e.g. to provide support, for any questions about your report, and so that you can be kept updated on the investigation);
- any known details about the events underlying the report, including:
  - date, time and location;
  - name of person(s) involved and possible witnesses to the events; and
  - evidence of the events (eg documents, emails etc).

Reports should also include any steps a *Whistleblower* may have already taken to report the matter elsewhere to resolve the concern (either internally within the *Group* or externally).

If the report does not include sufficient information to form a reasonable basis for investigation, an *Investigation Officer* will request additional information from you. If this additional information cannot be obtained and the investigation is unable to be carried out, the report will be closed and you will be informed.

This *Policy* will not apply where a report that does not constitute a *Disclosable Matter* (including where there is no reasonable basis for a report) or it is not made in accordance with the requirements of the *Whistleblowing Legislation* as summarised in this *Policy*.

### 4.4 False reporting

Disclosures which are subsequently found to be knowingly false will be considered a serious matter and may lead to disciplinary action, up to and including termination of employment or engagement. There may also be legal consequences if a deliberately false or reckless report is made.

### 4.5 Anonymity and confidentiality

Reports can be made anonymously and still be entitled to the protections set out in this *Policy* and under the *Whistleblowing Legislation* provided the other requirements for making the disclosure are complied with. In making a report, *Whistleblowers* may:

- advise that they wish to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised;
- place restrictions on who knows their identity;
- place restrictions on who is informed of their disclosure; or
- refuse to answer questions that they feel could reveal their identity during follow-up conversations.

Subject to the following qualifications, *RFG* will comply with these requests, but notes that, whilst it will still make best endeavours to investigate the report, there may be practical limitations in doing so. The *Group's* ability to provide the protections outlined in this *Policy* may be limited where a *Whistleblower* desires to remain anonymous.

Information received from a *Whistleblower*, including information relating to their identity or which could lead to their identification, will be treated with strict confidentiality and will not be shared unless:

- the *Whistleblower* has provided their prior consent, preferably in writing;
- *RFG* is required or allowed by law (for example, disclosure to a lawyer to get legal advice related to the law on whistleblowing); or
- the report is made to *ASIC*, *APRA*, the Commissioner of Taxation or the Australian Federal Police.

*RFG* may also disclose the information contained in a *Whistleblower Disclosure*, with or without the *Whistleblower's* consent, if:

- the information does not include the *Whistleblower's* identity;
- all reasonable steps have been taken to reduce the risk that the *Whistleblower* will be identified from the information; and
- it is reasonably necessary for investigating the issues raised in the disclosure.

It is illegal for a person to identify a *Whistleblower* who has made a protected disclosure, or disclose information that is likely to lead to their identification, outside the exceptions listed above. Any breach of confidentiality in relation to the *Whistleblower's* identity or their disclosure will be taken seriously, and may be the subject of a separate investigation and or disciplinary action.

## 5. Investigations

### 5.1 Assessment of a disclosure

*RFG* will investigate all *Disclosable Matters* reported under this *Policy* as soon as practicable after the matter has been reported.

On receipt of a disclosure by an *RFG Eligible Recipient* (a *Reviewing Officer*), a determination will be made by that *Reviewing Officer* as to whether the matter falls within the intended scope of this *Policy*.

### 5.2 Review of Allegations

Where it is assessed that a report falls within the intended scope of this *Policy*, the *Reviewing Officer* may, subject to the confidentiality and other protections set out under this *Policy*, assign a suitable *Investigation Officer* (who is not implicated directly or indirectly by the report) to investigate the substance of the report and determine whether further investigation is necessary. Information relating the identity of the *Whistleblower*, or which could lead to their identification, will not be shared with the *Investigation Officer* without the *Whistleblower's* prior consent.

The investigation may be supported or conducted by an external party, particularly where *Allegations* are serious.

The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the *Disclosable Matter* and the circumstances.

While the particular investigation process and enquiries adopted will be determined by the nature and substance of the report, in general, as soon as practicable upon receipt of the report, if the report is not anonymous, the *Reviewing Officer* will contact you to discuss the investigation process, including who may be contacted and such other matters as are relevant to the investigation.

Where the report is submitted anonymously, we will conduct the investigation and our enquiries based on the information provided to us.

### 5.3 Investigation findings

The investigation process will vary depending on the nature of the *Allegations* and the amount of information provided. We will endeavour to conclude an investigation within three months of receiving a *Whistleblower Disclosure*. Where, however, complex issues are raised, investigations may take longer to complete.

Where appropriate, we will provide a *Whistleblower* feedback regarding the investigation's progress and outcome (subject to considerations of the privacy of those against whom *Allegations* are made and any legal requirements).

An investigation may conclude with a report from the *Investigation Officer* or other investigator. Initially the report will be provided to the *Reviewing Officer*. Any such report will include findings on the *Allegations* and a summary of the evidence on which conclusions have been drawn. The report will remain the property of *RFG* and will not be shared with the *Whistleblower* or the person(s) against whom allegations were made.

Potential outcomes of an investigation may include:

- the *Allegations* being substantiated and appropriate action being taken;
- the *Allegations* not having been substantiated, and no further action taken unless further evidence becomes available; or
- a determination was not possible and no further action will be taken unless further evidence becomes available.

Where a *Whistleblower Disclosure* is substantiated, we will consider whether changes to our processes and systems are required to reduce the likelihood of the *Disclosable Matter* happening again. Where a person is found to have engaged in misconduct, the matter will be dealt with in accordance with *RFG's* disciplinary procedures. This may result in disciplinary action, including dismissal.

### 5.4 Fair treatment of persons mentioned in Whistleblower Disclosure

*RFG* is committed to ensuring the fair treatment of *Employees* and others engaged by the *Group* who are mentioned in reports of *Disclosable Matters*, or to whom those disclosures relate. Fair treatment of those persons includes but is not limited to:

- being given the opportunity to be 'heard' on, and respond to, the *Allegations* as against them before any findings are made as against them;
- being given the opportunity to have their responses considered by *RFG* and, in appropriate circumstances, investigated; and

- where appropriate, advising the implicated person prior to any actions being taken (e.g. the commencement of any investigation or referring the disclosure to ASIC, APRA or the Australian Federal Police).

During any investigation into a *Disclosable Matter*, RFG extends support and protection to *Employees, Directors* and others engaged by it and implicated in the report, until those investigations are concluded and claims have been proven or dismissed. Any suspected adverse or detrimental treatment in this regard should be reported to a *Protection Officer* so that these matters may be addressed.

RFG will endeavour to respond promptly to any complaints raised by parties affiliated with a *Whistleblower* and their disclosure where that party has concerns about unfair treatment in the context of assessment of, and investigation into, the *Disclosable Matter*.

Where an investigation does not substantiate a disclosure made in a protected report, the fact that an investigation has been carried out, the results of the investigation, and the identity of any person the subject of the report will remain confidential, unless the subject of the report requests otherwise.

## 6. Protection & Support

RFG is committed to ensuring confidentiality in respect of all matters raised under this *Policy*, and that those who make a *Whistleblower Disclosure* are treated fairly and are not affected by *Detrimental Conduct*.

The *Group* does, however, retain the ability to raise with a *Whistleblower* matters that arise in the ordinary course of their employment or engagement (e.g. separate performance or misconduct issues).

In addition, to obtain external support *Whistleblowers* who are *Workplace Participants* may also access the *Group's* Employee Assistance Program, details of which are provided on the RFG intranet.

### 6.1 Role of the Protection Officer

To ensure that a *Whistleblower* receives the appropriate protections and support a *Protection Officer* will be appointed for each *Whistleblower Disclosure*. The *Protection Officer* is responsible for:

- protecting *Whistleblowers* from *Detrimental Conduct*;
- keeping in contact with *Whistleblowers*; and
- considering any complaints regarding *Detrimental Conduct* as a result of a disclosure under this *Policy*, or concerns about how this *Policy* has been applied.

*Whistleblowers* should promptly inform the *Protection Officer* if they believe they have been the subject of retaliation or other *Detrimental Conduct*, or have concerns about how this *Policy* has been applied to their disclosure.

### 6.2 Protection from detrimental acts or omissions

RFG will not tolerate retaliation or other forms of *Detrimental Conduct* relating to a *Whistleblowing Disclosure* under this *Policy*.

Where appropriate, to protect a *Whistleblower* from the risk of *Detrimental Conduct*, RFG may:

- allow them to perform their duties from another location;
- reassign them to another role (at the same level);
- make modifications to their workplace or the way work duties are carried out; or
- reassign or relocate other staff involved in the *Disclosable Matter*.

Where *Detrimental Conduct* has occurred, *RFG* will investigate and address the *Detrimental Conduct*, including by taking any appropriate disciplinary action. *RFG* may also:

- allow the *Whistleblower* to take extended leave;
- develop a career development plan for the *Whistleblower*, including new training and career opportunities; or
- discuss other potential remedies with the *Whistleblower* who has been subject to the *Detrimental Conduct*.

In some circumstances, *RFG* may be required to take administrative action to protect *Whistleblowers* from *Detrimental Conduct*. This kind of administrative action is not *Detrimental Conduct*. It will also not be *Detrimental Conduct* where *RFG* is required to manage a *Whistleblower's* unsatisfactory work performance in line with *RFG's* performance management procedures. Where it is appropriate, *RFG* will inform the *Whistleblower* about the reason for any administrative or management action.

A *Whistleblower* may seek independent legal advice or contact regulatory bodies (such as ASIC or APRA) if they believe they have suffered *Detrimental Conduct*.

### 6.3 Protection of confidentiality, files & records

To ensure the confidentiality of a *Whistleblower's* identity, *RFG* will ensure:

- all their personal information or reference to them witnessing an event will be redacted and securely retained;
- they will be referred to in a gender-neutral context;
- where possible, they will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them; and
- disclosures will be handled and investigated by an *Investigation Officer*.

Unauthorised release of information to someone not involved in the investigation without your consent as a *Whistleblower* will be a breach of this *Policy*.

*Whistleblowers* are assured that a release of information in breach of this *Policy* will be regarded as a serious matter and will be dealt with under *RFG's* disciplinary procedures.

### 6.4 Civil, criminal and administrative liability protection

Where a *Whistleblower* makes a report in relation to a *Disclosable Matter* under this *Policy* (including where disclosures are made anonymously), they may also be eligible for separate protections under *Whistleblowing Legislation* from the following forms of liability:

- civil liability (e.g. any legal action against the *Whistleblower* for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (e.g. attempted prosecution of the *Whistleblower* for unlawfully releasing information, or other use of the disclosure against the *Whistleblower* in a prosecution (other than for making a false disclosure)); and
- administrative liability (e.g. disciplinary action for making the disclosure).

The *Whistleblower* is not protected from civil or criminal liability for any of his or her conduct which may be revealed by the report. However, if a *Whistleblower* reports such conduct and actively cooperates in an investigation in which they may be implicated, the fact they have made a report may be taken into account as a mitigating factor when determining actions which may be taken against them.

## 6.5 Compensation and other remedies

Under the *Whistleblowing Legislation*, a person may bring civil proceedings for a compensation order or pursue civil penalties if:

- the *Whistleblower* (or any other person) suffer loss, damage or injury because of a disclosure; and
- *RFG* failed to take reasonable precautions and exercise due diligence to prevent the *Detrimental Conduct*.

Whistleblowers should seek independent legal advice if they believe they are entitled to compensation or other relief under the *Whistleblowing Legislation*.

## 6.6 Escalations to the CEO

You may escalate your concern to the *CEO* if you consider that:

- the *Investigation Officer* has not adequately resolved a complaint; or
- this *Policy* has not been adequately implemented.

You may request that the *Protection Officer* escalates your concerns to the *CEO* if you are not satisfied with the:

- findings of the investigation; or
- a decision of the *Reviewing Officer* or *Investigation Officer* not to conduct an investigation.

## 7. Group Reporting Procedures and Governance

The *Protection Officer* will report to the *Board* on the number and type of *Whistleblower* incident reports annually, to enable *RFG* to address any issues at a *Group*, divisional or business unit level.

The Audit & Risk Management Committee will receive copies of all *Whistleblower* reports, and investigative reports completed in accordance with this *Policy*. In addition, serious and material *Disclosable Matter* will be considered by the *Reviewing Officer* for immediate referral to the Chairman of the Audit & Risk Management Committee.

In each case, these reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this *Policy*.

## **8. Consequences of Breach**

*Workplace Participants* should understand that a breach of this *Policy* may result in disciplinary action, up to and including termination of employment or engagement.

Where a breach of this *Policy* also results in the breach of any law, *Workplace Participants* may also be personally liable for their actions.

## **9. Questions**

If you have any questions about this *Policy* or you require any information about the protection provided by law to *Whistleblowers*, you are encouraged to contact the *Protection Officer* allocated to your *Whistleblower Disclosure* using the details supplied in Appendix 2. Alternatively, you can seek independent legal advice.

## **10. Distribution of Policy**

This *Policy* must be distributed to all *Workplace Participants* and will be posted on RFG's intranet.

## **11. Review**

The *Board* is committed to regularly reviewing this *Policy* for effectiveness. This *Policy* may only be amended with the approval of the *Board*.

## Appendix 1 - Definitions

In this *Policy*, words printed in *italics* have the following meanings:

<i>Allegations</i>	Allegations of a <i>Disclosable Matter</i> raised in a <i>Whistleblower Disclosure</i> .
<i>APRA</i>	Australian Prudential Regulation Authority.
<i>ASIC</i>	Australian Securities and Investments Commission.
<i>Board</i>	The board of <i>Directors</i> of <i>RFG</i> from time to time.
<i>CEO</i>	<i>RFG</i> 's top ranking executive officer, regardless of title, from time to time.
<i>Company Secretary</i>	<i>RFG</i> 's Company Secretary from time to time.
<i>Corporations Act</i>	<i>Corporations Act 2001</i> (Cth), including regulations made for the purposes of that Act.
<i>Detrimental Conduct</i>	Any actual or threatened conduct that could cause a detriment to the <i>Whistleblower</i> as a result of making a <i>Whistleblower Disclosure</i> , including: <ul style="list-style-type: none"> <li>• termination of employment;</li> <li>• harassment, bullying or intimidation;</li> <li>• alteration of an <i>Employee</i>'s position or duties to his or her disadvantage;</li> <li>• personal or financial disadvantage;</li> <li>• unlawful discrimination;</li> <li>• harm or injury, including psychological harm;</li> <li>• damage to reputation or property; or</li> <li>• any other conduct that constitutes retaliation or may cause damage to a person.</li> </ul>
<i>Director</i>	A director of a <i>Group</i> member.
<i>Disclosable Matter</i>	Refer Section 3.1 of this <i>Policy</i> .
<i>Eligible Recipient</i>	Refer Section 4.1 of this <i>Policy</i> .
<i>Eligible Whistleblower</i>	Refer Section 2 of this <i>Policy</i> .
<i>Employee</i>	Full-time, part-time, casual and temporary employees of the <i>Group</i> .

<i>Group</i>	<i>RFG</i> , its controlled entities and related bodies corporate.
<i>Investigation Officer</i>	An officer, employee or contractor of the <i>Group</i> who has responsibility for conducting investigations into a <i>Whistleblower Disclosure</i> .
<i>Policy</i>	This Whistleblower Policy.
<i>Protection Officer</i>	An officer, employee or contractor of the <i>Group</i> identified in Appendix 2 who has responsibility for protecting <i>Whistleblowers</i> in accordance with this <i>Policy</i> . A <i>Protection Officer</i> cannot also act as an <i>Investigation Officer</i> in relation to the same report of a <i>Disclosable Matter</i> .
<i>Reviewing Officer</i>	The <i>RFG Eligible Recipient</i> who receives a report from a <i>Whistleblower</i> in accordance with this <i>Policy</i> .
<i>RFG</i>	Retail Food Group Limited.
<i>Seconded</i>	An individual who is seconded temporarily to the <i>Group</i> but who is employed by a non- <i>Group</i> entity.
<i>We</i>	The <i>Group</i> .
<i>Whistleblower Disclosure</i>	A disclosure made by a <i>Whistleblower</i> that is being treated in accordance with this <i>Policy</i> .
<i>Whistleblowing Legislation</i>	The <i>Corporations Act</i> (sections 1317AA to 1317AK) and the <i>Taxation Administration Act 1953</i> (Cth) (sections 14ZZT to 14ZZZE), both of which provide for the protection of <i>Whistleblowers</i> .
<i>Workplace Participant</i>	All officers, Employees and contractors of <i>RFG</i> , its controlled entities and related bodies corporate.
<i>You</i>	'You' or 'your' refer to a <i>Whistleblower</i> or someone contemplating making a disclosure of a <i>Disclosable Matter</i> .

## Appendix 2 Contact details for reporting channels & Protection Officer details

### Part 1: Eligible Recipients (refer s4.1 of this Policy)

#### Officers & Senior Managers of the Group:

Officer/Senior Manager	Email	Phone	Mail
[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

#### RFG's Auditor (including a member of the audit team)

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

#### Independently managed whistleblower hotline service

[REDACTED]

***Part 2: Protection Officer***

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]