



Group Whistleblowing Policy

Reliance Worldwide Corporation Limited (ACN 610 855 877)



Introduction

Reliance Worldwide Corporation Limited (“RWC”) is committed to the highest standard of conduct and ethical behaviour in its business activities; and to promoting and supporting a culture of corporate compliance and honest and ethical behaviour.

RWC encourages the reporting of suspected unethical, illegal, fraudulent, corrupt or dishonest conduct and aims to ensure that those who promptly report may do so with confidence and without fear of intimidation, ramifications or adverse consequences.

All legal entities in the RWC group are obliged to follow the principles of this Group Whistleblowing Policy (“Group Policy”) and also have regard to any applicable local legislation in the countries where they operate.

RWC may amend this Group Policy from time to time at its discretion.

Link with RWC's other policies and documents

This Group Policy should be read in conjunction with any local country RWC whistleblowing policies. It should also be read in conjunction with RWC’s Code of Conduct and other policy documents which can be found on RWC's external website at: www.rwc.com/investors/corporate-governance (Resources tab).

To the extent that there is any inconsistency between the above policies and this Group Policy, this Group Policy takes precedence in relation to the matters set out in this Group Policy but subject to any applicable local legislative requirements which may take precedence.

RWC is committed to its vision and values which can be found on the RWC website (www.rwc.com) and on the RWC intranet site.

Policy Access

A copy of this Group Policy is accessible to all employees and officers of RWC and its subsidiaries via RWC's external website at: www.rwc.com/investors/corporate-governance (Resources tab). This Group Policy is also accessible via the RWC intranet site.

1. Making a Report

(a) What matters should be reported under this Group Policy?

- 1.1 It is important that RWC is aware of any information which allows it to appropriately manage risks to the RWC group’s employees, customers, property, business and reputation.
- 1.2 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 RWC or any related body corporate of RWC then this is a disclosable matter for the purposes of this Group Policy. Such matters may also be disclosable under applicable local legislation.
- 1.3 In addition, you should also report any other conduct or activity which you reasonably believe poses a significant risk to the RWC group’s employees, property, operations or reputation and/or the community. Reports in relation to such conduct may be treated as disclosable matters under this Group Policy.



1.4 Examples of reportable conduct under this Group Policy may include:

- dishonest, corrupt, fraudulent or unlawful conduct or practices, including bribery;
- 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);
- financial irregularities;
- unfair, dishonest or unethical dealings with a customer or third party;
- unethical or serious improper conduct including breaches of any legal or regulatory obligations, breaches of RWC's policies (such as the Code of Conduct or employee policy handbooks) and engaging in misleading or deceptive conduct especially in relation to accounting or financial reporting practices;
- any other kind of serious impropriety; or
- any other conduct or act that may cause loss to RWC or which may otherwise be detrimental to RWC's interests including unsafe work practices or abuse of the RWC group's property or resources.

1.5 RWC expects all employees and officers of RWC or a related body corporate of RWC to report any disclosable matters.

1.6 A whistleblower is encouraged to reveal, at the outset, any personal interest or involvement they may have in the matter. A failure to disclose any personal interests will not prevent the reported disclosure being investigated pursuant to this Policy.

(b) What matters should not be reported under this Group Policy?

1.7 Personal work-related grievances should not be reported under this Group Policy and may not be protected under applicable legislation.

1.8 Some examples of matters which should not be reported under this Policy include:

- an interpersonal conflict between employees;
- a staff member's dissatisfaction with their pay (unless the staff member's grievance relates to discriminatory conduct in some respect);
- a staff member's dissatisfaction with their performance feedback or results of their annual performance review (unless the staff member's grievance relates to discriminatory conduct in some respect); and
- a staff member's failure to receive a promotion on grounds unrelated to discriminating conduct.

(c) Who can make a report of whistleblowing disclosure?

1.9 The following people are eligible to make disclosure under this Group Policy:

- (a) an officer of RWC. An officer includes directors of the board and the company secretary of RWC and any of its related bodies corporate;



- (b) an employee of RWC or its related bodies corporate;
- (c) an individual who supplies services or goods to a RWC group company;
- (d) an employee of a supplier of services or goods to a RWC group company;
- (e) an individual who is an associate of a RWC group company (this includes directors and secretaries of both RWC and any related bodies corporate);
- (f) a spouse, child or other relative of an individual listed above;
- (g) a dependant of any individual listed above or of their spouse; or
- (h) someone who was formerly any of the above (e.g. a former employee).

1.10 The persons listed above are all eligible whistleblowers.

(d) Who to report conduct to?

1.11 Receiving disclosures is a process that requires careful training to ensure whistleblower protections are maintained. Disclosures can be made confidentially and anonymously at any time via the following methods:

- (a) the RWC Ethics Hotline, administered by an independent third party provider. Reports can be made online to the RWC Ethics Hotline via www.integritycounts.ca/org/rwc or by email to rwc@integritycounts.ca The RWC Ethics Hotline also has a telephone hotline service (<https://www.integritycounts.ca/call-the-hotline>), which can be accessed as follows:
 - (i) **Step 1**: Call your international operator. Details of toll free hotline numbers are available in each RWC office;
 - (ii) **Step 2**: Ask the operator to place a collect call to 001-604-922-5953;
 - (iii) **Step 3**: When the call is accepted by WhistleBlower reception, please ask for a WhistleBlower Agent; and
 - (iv) **Step 4**: Report your incident to the agent;

(b) nominated senior group personnel:

For the purposes of this Policy, the nominated senior personnel are Disclosure Officers who are authorised to receive disclosures that may qualify for protection under applicable local whistleblowing legislation.

1.12 Whistleblowers are encouraged to report any disclosure via the methods set out in section 1.11 above. The making of a report via any of those methods will mean that it has been made to an eligible recipient.

1.13 Whistleblowers may also report such information to the following additional eligible recipients:

- (a) an officer of RWC and related bodies corporate (including the Board of RWC);
- (b) an external or internal auditor, or a member of an external or internal audit team conducting an audit of RWC or any related body corporate of RWC;
- (c) an actuary of RWC or any related body corporate of RWC;



- (d) any person authorised by RWC to take disclosures (being those persons nominated in section 1.11 above); or
- (e) a senior manager of RWC or any related body corporate of RWC. Senior managers are generally those people who make, or participate in making, significant business decisions of the RWC group.

1.14 Local applicable legislation may permit reporting of disclosable matters to certain approved external organisations. However, if a whistleblowing report is made to one of these organisations, RWC will not automatically become aware of that report and therefore may not be able to respond to it in accordance with this Group Policy.

(e) How to make a disclosure?

1.15 Disclosures are most useful when they include key information that offers actionable insight. Disclosures should include as much of the following information as possible if known by the person reporting the misconduct:

- **What occurred** – describe the act that is suspected or has been witnessed. It is useful to also describe what should have happened, so the report taker is clear about the nature of misconduct being described. Report what occurred; the sequence of events leading up to witnessing the act; steps observed and any actions taken to confirm suspicions or observations.
- **How the misconduct was executed** – describe any factors that may have enabled the misconduct or contributed to misconduct going undetected, being concealed or being previously unidentified.
- **Where it occurred** – the physical location/address that the misconduct occurred; the work location of those perpetrating misconduct or the location where the misconduct was observed.
- **When the misconduct occurred** – key dates of actions suspected or observed relating to the misconduct being disclosed. If a series of events occurred, offer these in chronological order if possible.
- **Who was involved** – offer names and job titles of those associated with the misconduct if known or information that may help identify those that may have been associated with the misconduct. Also, offer names of others who may have witnessed or played a role in the acts being reported.

(f) No time limit on disclosures

1.16 There is no time limit associated with making disclosures under this Group Policy (although local legislation may impose time limits). However, the sooner misconduct is reported the more likely it is that reliable evidence will be able to be gathered as part of any investigation and RWC can address the matter.

1.17 There may be limitations regarding legal action that can be taken in response to proven allegations but this should not deter whistleblowers from making a disclosure about misconduct they have reasonable grounds to believe occurred. All disclosures can assist RWC to refresh risk management monitoring, training and controls.



(g) Anonymous disclosures

- 1.18 Whistleblowers are able to make an anonymous report and they will still be entitled to the protections set out in this Group Policy if the other requirements for making the disclosure are complied with.
- 1.19 However, if the whistleblower's identity is not provided when making a whistleblowing disclosure this:
- may prevent RWC from re-contacting the whistleblower confidentially to clarify or confirm information supplied;
 - may impact on RWC's ability to proceed with an investigation - if there are gaps in information supplied that cannot be clarified directly in confidence with a whistleblower;
 - may prevent RWC from updating the whistleblower efforts taken in response to their disclosure; and
 - may affect RWC's ability to take steps to protect the whistleblower from detriment.
- 1.20 If a whistleblower wants to maintain complete anonymity when making a disclosure, we suggest the whistleblower submits their disclosure on an anonymous basis via the methods outlined above in section 1.11 or if a disclosure is being made to any other eligible recipient listed in section 1.13 above:
- submits their disclosure from a computer not connected to RWC's global information technology network;
 - if making the disclosure by phone, calls from an unlisted number;
 - if submitting an email, uses a private email address (e.g. like Gmail or another external email provider) – not one connected to RWC's global information technology network; and
 - refrains from telling others that they have filed a whistleblowing disclosure.
- 1.21 Even if a whistleblower does not make the report on an anonymous basis the person receiving the report is not permitted to reveal the identity of the whistleblower, or information that is likely to lead to the identification of the whistleblower, except in certain circumstances as set out in section 5 below.

Whistleblowers who make anonymous reports are encouraged to maintain ongoing two-way communication with RWC so that RWC, where appropriate, can ask follow up questions and/or provide feedback.

(h) Disclosures outside of RWC

- 1.22 Generally only disclosures that are made to the list of people or entities set out in sections 1.11 and 1.13 above will ensure protections are afforded to the whistleblower making the disclosure. Making reports to others outside RWC may not obtain the protection of any applicable local whistleblowing legislation or any other protections provided by this Group Policy. This is because it is important to ensure that confidential information belonging to RWC and related bodies corporate of RWC is not disclosed outside of the RWC group.



2. Investigation of Reports

2.1 All reported disclosures made under this Group Policy will be reviewed and, where appropriate, will be investigated at the earliest opportunity. Any findings will be managed promptly. The way a disclosure is managed depends on what it involves and will be dealt with on a case by case basis.

Investigations will be subject to the confidentiality and other protections set out under this Group Policy and local policies; and will be undertaken by the appropriate person, in and/or outside RWC, depending on the nature of the investigation.

2.2 Where appropriate, RWC will provide feedback to the whistleblower about the progress of the investigation and/or the outcome, subject to confidentiality considerations, of the individuals allegedly engaging in disclosable matters.

2.3 In order to ensure that any investigations and actions undertaken are fair and unbiased, it may be necessary to:

(a) obtain specialist, independent advice including trained investigation staff from either inside RWC or refer the matter confidentially to a third-party investigation firm, if deemed appropriate having regard to the nature of the disclosable matters;

(b) appoint a person to assist in the investigation of a matter the subject of a report; or

(c) refer the matter to the police or law enforcement where disclosures refer to, or include, criminal behaviour.

2.4 In the conduct of an investigation, RWC may proceed as follows:

(a) Determine the nature and scope of the investigation;

(b) speak to anyone who may be affected or involved in the disclosure so that they are provided with the opportunity to respond to the allegation(s);

(c) consider these responses; and

(d) speak to witnesses (where there is a dispute as to the facts surrounding the allegations).

2.5 In certain circumstances, where RWC decides it is appropriate to do so, it may also place any persons affected by the report or the whistleblower on paid leave during part or all of the investigation.

2.6 Any whistleblowers who reveal their identity may be asked to participate in subsequent confidential interviews in relation to the claims made in the disclosure including to clarify facts supplied in order to proceed with further investigation.

2.7 There will be no adverse consequences for a whistleblower if they choose to suspend co-operation or if following investigation, a disclosure they made on reasonable grounds could not be substantiated. If a whistleblower believes they are being adversely treated or subject to some detriment in these instances, they should report their concerns via the methods set out in section 1.11 above.

2.8 The findings of any investigation into a disclosure (together with any remediation action plan) will be appropriately recorded by RWC and will be subject to the record-keeping and confidentiality obligations set out in this Group Policy. The method for documenting and



reporting the findings will depend on the nature of the disclosure. In most cases, a final investigation report will be provided to the RWC Audit & Risk Committee (a committee of the RWC Board) and may be provided to the RWC Board. Where necessary, any final investigation report may be redacted to protect the whistleblower's identity or information that may identify the whistleblower.

3. Fair treatment of employees that are the subject of a disclosure

- 3.1 RWC is also committed to ensuring the fair treatment of employees and other persons engaged by the RWC group who are mentioned in reports of Reportable Conduct, or to whom such disclosures relate. Fair treatment of those persons implicated in a misconduct disclosure includes but is not limited to the following:
- (a) the opportunity to be heard on, and respond to, the allegations against them before any adverse findings are made against them;
 - (b) the opportunity to have their responses considered by RWC and, in appropriate circumstances, investigated; and
 - (c) where appropriate, advising the implicated person prior to any actions being taken (e.g. the commencement of any investigation).
- 3.2 During any investigation into a disclosure of Reportable Conduct, RWC extends support and protection to employees, officers and others engaged by the RWC group and implicated in a report until such investigation has concluded and claims have been proven or dismissed. Any suspected adverse or detrimental treatment in this regard should be reported to either RWC's Group Company Secretary or Group General Counsel.
- 3.3 RWC will endeavour to respond promptly to any complaints raised by parties who are the subject of a disclosure where such party has concerns about unfair treatment in the context of assessment of, and investigation into the Reportable Conduct.
- 3.4 RWC will, where appropriate, provide the whistleblower with updates at various stages of any investigation into the disclosure. Any updates supplied to a whistleblower may need to be limited in order to also preserve the confidentiality of an investigation and the privacy of those potentially affiliated, named, implicated or associated with the matters disclosed. The frequency and detail of any updates supplied (where appropriate), and the initiation or resolution of any potential subsequent investigation, may vary according to the matters reported and the context of the misconduct disclosed. Any updates will be provided to the whistleblower by the persons listed in section 1.11(b).
- 3.5 RWC will, where appropriate, advise the whistleblower of the conclusion of any investigation and may provide the whistleblower with details of the outcomes of that investigation. Where claims cannot be substantiated, and the whistleblower's identity is known, RWC reserves the right to deem a disclosure closed and notify the whistleblower accordingly.

4. Proven misconduct

- 4.1 RWC reserves the right to institute performance management or take other disciplinary action, including termination of employment or engagement, in relation to those found to have committed corporate misconduct.
- 4.2 RWC also reserves the right to refer matters to law enforcement or regulatory bodies at any time should the misconduct, in RWC's reasonable opinion, warrant such a referral.



5. Protection and support of whistleblowers

(a) Protecting Confidentiality

- 5.1 You may choose to make a report on an anonymous basis, however, as noted in section 1.19, there are a number of advantages in connection with the investigation process if you disclose your identity.
- 5.2 If you do disclose your identity and you are an eligible whistleblower via the methods set out in section 1.11 above or to other eligible recipients, the recipient has an obligation to keep your identity confidential. This includes keeping confidential information which could lead to the disclosure of your identity.
- 5.3 RWC may have a legal right to share a whistleblower's identity or, if reasonably necessary, to refer an incident to local authorities who may wish to pursue the matter.
- 5.4 It may also be permissible for RWC, subject to local legislative requirements, to:
- (a) disclose information regarding the suspected or actual wrongdoing disclosed without revealing the whistleblower's identity or information that is likely to lead to the identification of the whistleblower;
 - (b) disclose information other than the whistleblower's identity if it is reasonably necessary for the purposes of the investigation and all reasonable steps are taken to reduce the risk that the whistleblower will be identified;
 - (c) disclose the identity of a whistleblower, or information likely to lead to his or her identification to a legal practitioner for the purposes of obtaining legal advice or representation in relation to the disclosure; or
 - (d) disclose the identity of a whistleblower where such disclosure is made with the consent of the whistleblower.
- 5.5 In order to allow for a proper investigation of the matter, and to provide support to the whistleblower, the recipient of your disclosure may ask you to consent to the disclosure of your identity to specific individuals, such as:
- (a) Disclosure Officers;
 - (b) Members of RWC's Board;
 - (c) RWC's Group Company Secretary; and
 - (d) any other persons reasonably necessary for the purposes of investigating matters the subject of your disclosure.
- 5.6 Recipients of a report from a whistleblower relating to disclosable matters must not reveal the identity, or information that is likely to lead to identification, of the whistleblower without the written consent of the whistleblower or without the express permission of RWC's Group Company Secretary or General Counsel to make the disclosure. Such action may be illegal and constitute a criminal offence.
- 5.7 Whistleblowers can be assured that any information released in breach of this Policy will be treated seriously and may result in disciplinary action, potentially including dismissal. A breach of this Policy may in certain circumstances also result in criminal sanctions.



(b) General protections

- 5.8 RWC is committed to protecting and respecting the rights of whistleblowers. RWC will not tolerate any detriment caused, or threatened to be caused against any person who has made or who is believed to have made a report regarding disclosable matters. Detriment is defined to include, without limitation, any of the following:
- (a) dismissal;
 - (b) injuring an employee in their employment, (e.g. not giving an employee legal entitlements such as pay or leave);
 - (c) changing an employee's job to their disadvantage;
 - (d) offering a potential employee different (and unfair) terms and conditions for the job, compared to other employees;
 - (e) discriminating between employees to the disadvantage of a whistleblower;
 - (f) harassment or intimidation of a person;
 - (g) harm or injury to a person, including psychological harm;
 - (h) not hiring someone because they have been a whistleblower;
 - (i) damage to a person's property, reputation, business or financial position; or
 - (j) any other damage to a person.
- 5.9 Any victimisation, retaliation or detriment caused or threatened to be caused in reprisal for a report regarding disclosable matters being made under this Group Policy will be treated as misconduct and may result in disciplinary action, which may include termination of employment (or termination of engagement).
- 5.10 If you experience or discover any such detrimental conduct, or potential conduct, you should report it immediately via the methods set out in section 1.11 above.

(c) Potential Fines

- 5.11 In addition to potential disciplinary action, significant penalties may apply to persons who fail to maintain whistleblower protections, including under applicable local legislation.
- 5.12 Such fines and associated liability will remain the responsibility of the employee and will not be paid by RWC or any of its related bodies corporate.

(d) Support of whistleblowers

- 5.13 RWC firmly believes that those who reasonably suspect or witness misconduct should be able to report their suspicions with the confidence that they will be supported, and not punished or discriminated against for making a disclosure.
- 5.14 Whistleblowers are encouraged to raise any concerns arising out of a disclosure (or anticipated disclosure) or any subsequent investigation process via the methods set out in section 1.11 above.



6. Criminal or civil liability

- 6.1 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, there may be some cases where the fact they have made a report will be taken into account as a mitigating factor when determining actions which may be taken against them.

7. False reports

- 7.1 Whistleblowers must have reasonable grounds for the claims made in their disclosures. However, a whistleblower is not required to prove their allegations and can still qualify for protection even if their disclosure turns out to be incorrect.
- 7.2 Where it is shown that a person making a report has made malicious, false or vexatious allegations of improper conduct, then the making of that report will be considered a serious matter and may render the person concerned subject to disciplinary proceedings which may include demotion, suspension or termination of employment. However, no action will be taken against an employee who makes a report, based on reasonable grounds to suspect misconduct or an improper state of affairs, which is not substantiated in a subsequent investigation.

8. Training

a) Employee Whistleblowing Training

- 8.1 RWC will conduct regular training for employees on this Policy and their rights and obligations under it. This training will include, but is not limited to, information on the following:
- (a) the local legislative whistleblowing regime and how this Group Policy interacts with statutory protections;
 - (b) the kinds of matters that are disclosable under this Group Policy;
 - (c) the process of making a disclosure (including to whom a disclosure can be made);
 - (d) RWC's investigation processes; and
 - (e) support that RWC offers to whistleblowers and persons who are the subject of a disclosure.

b) Recipient Whistleblowing Training

- 8.2 RWC will conduct regular training for those persons who may receive whistleblowing disclosures. This training will include, but is not limited to, the following:
- (a) how to receive reports and obtain essential information;
 - (b) how best to protect the anonymity of the discloser (if an anonymous disclosure has been made) and the confidential nature of the disclosure;
 - (c) how to assist with, and where appropriate, conduct the investigation process;
 - (d) how to provide continued support to whistleblowers and persons who are the subject of a disclosure; and



(e) how management will address risks of detriment, manage conflicts and ensure fairness when managing the performance of, or taking other management action relating to, a whistleblower.

9. Review of Policy

9.1 RWC will periodically review this Group Policy to ensure that it is operating effectively and determine whether or not any changes are required to be made.

16 December 2019