



# Group Whistleblowing Policy

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**Reliance Worldwide Corporation Limited (ACN 610 855 877)**

## PURPOSE

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Reliance Worldwide Corporation Limited (“RWC”) is committed to honesty, integrity, and fair dealing in all of our business activities. As part of this commitment, RWC treats all reports of actual or suspected misconduct with seriousness and ensures they are properly assessed and investigated. RWC encourages all employees to report any instances which they reasonably believe is a violation of law, regulations, or RWC Policy.

The purpose of this Policy is to create a framework for reporting instances of compliance-related misconduct. At a high level, it is important to understand a few things:

- Our Policy applies to everyone at the company.
- Reports of misconduct can be submitted anonymously.
- All reports will be reviewed, assessed, and investigated in accordance with RWC’s Internal Investigation Framework.
- To the extent permitted by law, the subject matter of the investigation and the identity of the whistleblower will be strictly confidential.
- Any employee who initiates a report of misconduct or cooperates with an investigation is protected by RWC’s non-retaliation policy.

## SCOPE

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This Policy applies to all RWC entities worldwide including (1) all officers, directors, and employees of RWC, and (2) RWC’s third-party business partners (collectively referred to as “employee” or “employees”). Local variations are permitted as necessary to comply with local laws.

**\*NOTE:** All RWC officers, directors, employees, and third-party business partners based in Australia should refer to RWC’s **Australia Whistleblower Policy**.

## STANDARD OF CONDUCT

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All employees are required to comply with RWC’s Compliance Program, company values, standards of conduct, and compliance-related policies and procedures. Any employee who has a good faith belief of actual or suspected misconduct must report such misconduct in accordance with this Policy.

- A. **Making a Report**. Any employee with a good faith belief of actual or suspected misconduct must report such misconduct to the **RWC Ethics Hotline**. The hotline, which is administered by an independent third-party provider, can be accessed in three ways:
- online via [www.integritycounts.ca/org/rwc](http://www.integritycounts.ca/org/rwc),
  - by email at [rwcc@integritycounts.com](mailto:rwcc@integritycounts.com), or
  - by telephone (for a list of Country-specific numbers and reporting instructions visit [www.integritycounts.ca/call-the-hotline](http://www.integritycounts.ca/call-the-hotline)).

The **RWC Ethics Hotline** allows employees to submit anonymous reports if they are not comfortable disclosing their identity. Employees who submit anonymous reports are encouraged to remain in contact with RWC so that follow-up questions can be asked, if needed, and/or feedback can be provided.

In the alternative, reports of misconduct may be submitted directly to (1) a supervisor or senior manager; (2) a member of the Human Resources team, or (3) the Global Compliance team.

- B. When to Make a Report. There is no time limit associated with making a report under this Policy. However, employees are encouraged to report actual or suspected misconduct as soon as possible. Prompt reporting will ensure that reliable evidence can be preserved and collected as part of RWC's investigation process.
- C. Investigating Reports. Reports submitted through the **RWC Ethics Hotline** or directly to a supervisor, manager, a member of Human Resources, or the Global Compliance team will be reviewed, assessed, investigated in accordance with RWC's **Internal Investigation Framework**.

## **FAIR TREATMENT OF EMPLOYEES**

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RWC is committed to ensuring the fair treatment of RWC employees and related parties who are involved in the report or alleged misconduct including the whistleblower, any relevant witnesses, and the individuals suspected of misconduct. Fair treatment includes a thorough, fair, and objective investigation that provides the accused an opportunity to respond to the allegations before any adverse findings are made against them. In addition, the whistleblower and witnesses, as discussed in more detail below, are protected against any retaliation for initiating a report or cooperating with the investigation.

## **CONFIDENTIALITY**

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To the extent permitted by law, RWC will keep the subject matter of the investigation and the identity of the whistleblower, if known, strictly confidential. Only individuals with a legitimate interest will be informed as to the nature of the report and/or the status and findings of the investigation. In addition, when required, RWC may disclose information about a report or investigation to an appropriate governmental entity, regulatory authority, or tribunal.

Any improper disclosure of confidential information related to the investigation, cooperating witnesses, or the whistleblower is subject to disciplinary action up to and including termination.

## **NON-RETALIATION**

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RWC has a strict non-retaliation policy. No adverse action will be taken against any employee who submits a good faith report of actual or suspected misconduct or cooperates with an investigation. Any actual or threatened retaliatory action against such an employee is a violation of this policy and subject to disciplinary action up to and including termination. In addition, any employee who violates RWC's non-retaliation policy may be subject to fines and other penalties under applicable law.

Any employee who has a good faith belief that they have been subject to adverse action for initiating a report or cooperating with an investigation should report such misconduct as described in this Policy.

## **RELATED DOCUMENTS**

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This Policy should be read alongside the following policies, procedures, or guidance documents which provide more detailed information related to reporting misconduct:

- Code of Conduct
- Internal Investigation Framework
- Frequently asked questions attached as **Appendix A**

## **APPENDIX A: Frequently Asked Questions**

**What types of misconduct should be reported?** Any conduct that would constitute a violation of law or RWC's Compliance Program, company values, standards of conduct, and compliance-related policies and procedures should be reported. This includes:

- dishonest, corrupt, fraudulent, or unlawful conduct or practices, including bribery
- conduct involving substantial risk to public health and safety, or the environment
- financial irregularities
- unfair, dishonest, or unethical dealings with a customer or third party
- misleading or deceptive conduct especially concerning accounting or financial reporting practices
- conduct that could result in substantial fines, penalties, or reputational damage
- conduct that could significantly disrupt the business
- conduct in retaliation for raising a report of misconduct or cooperating in an investigation
- any other kind of serious impropriety

**What types of complaints should not be reported under this Policy?** Generally, personal work-related grievances should not be reported under this Policy. This includes:

- an interpersonal conflict between employees
- an employee's dissatisfaction with their pay or bonus (unless the complaint relates to discriminatory conduct or conduct in retaliation for raising a report or cooperating in an investigation)
- an employee's dissatisfaction with their performance feedback or results of their annual performance review (unless the complaint relates to discriminatory conduct or conduct in retaliation for raising a report or cooperating in an investigation)
- an employee's failure to receive a promotion (unless the complaint relates to discriminatory conduct or conduct in retaliation for raising a report or cooperating in an investigation)

These types of complaints should be reported directly to Human Resources.

**Why type of information should I include in my report?** Reports are most useful when they include key information that offers actionable insight. If known, reports should include as much of the following information as possible:

- What occurred – include information that describes the misconduct that is suspected or that has been observed. It is useful to also describe what should have happened, so the report taker is clear about the nature of misconduct being alleged. Details related to the sequence of events leading up to misconduct (or suspected misconduct) should also be included in the report.
- How the misconduct was executed – identify any factors that may have enabled the misconduct or contributed to the misconduct going undetected, being concealed, or being previously unidentified.
- Where it occurred – the physical location/address that the misconduct occurred or the location where the misconduct was observed.
- When the misconduct occurred – key dates of actions suspected or observed relating to the misconduct should be disclosed. If a series of events occurred, offer these in chronological order if possible.

- Who was involved – offer names and/or 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, provide names of others who may have witnessed or played a role in the acts being reported.

In addition, a whistleblower is encouraged to disclose any personal interest or involvement in the matter.

**What happens after I submit a report?** After a report is submitted in accordance with this Policy, it will be reviewed, assessed, investigated in accordance with RWC's *Internal Investigation Framework*. RWC will, where appropriate, provide the whistleblower with updates at various stages of any investigation into the report. Any updates supplied to a whistleblower may need to be limited to preserve the confidentiality of an investigation and the privacy of those potentially affiliated, named, implicated, or associated with the matters reported.

**Will my report be treated differently if I submit it anonymously?** No. All good faith reports submitted through *RWC Ethics Hotline* or directly to a supervisor, manager, a member of Human Resources, or the Global Compliance team will be reviewed, assessed, investigated in accordance with RWC's *Internal Investigation Framework*. However, anonymous reports may:

- prevent RWC from re-contacting the whistleblower confidentially to clarify or confirm the information provided.
- impact RWC's ability to proceed with an investigation – especially if there are gaps in the information provided that cannot be clarified directly in confidence with the whistleblower.
- prevent RWC from updating the whistleblower about the efforts taken in response to their report.

For these reasons, anonymous whistleblowers are encouraged to periodically contact RWC to ensure there are no follow-up questions or requests for additional information. Moreover, regular communications with RWC will ensure the anonymous whistleblower is updated on the progress and results of the investigation.

**What are examples of adverse actions in violation of RWC's non-retaliation policy?** Adverse actions that could be viewed as retaliatory conduct includes the following:

- dismissal or termination
- harassment or intimidation
- harm or injury including psychological harm
- denying employment-related entitlements (*e.g.*, leave, vacation, pay, etc.)
- changing job responsibilities
- withholding a bonus or promotion
- excluding from key decisions or meetings

Any employee who has a good faith belief that they have been subject to adverse action for initiating a report or cooperating with an investigation should report such misconduct as described in this Policy.

**What are the consequences for submitting a report that turns out to be false or uncorroborated?**

Any employee with a good faith belief of actual or suspected misconduct should submit a report in accordance with this Policy. The whistleblower is not required to prove the allegations in their report and is not subject to disciplinary action if their good faith report is incorrect or uncorroborated. However, any employee who *knowingly* submits a false report of misconduct is subject to disciplinary action up to and including termination.