



WHISTLEBLOWER POLICY

POLICY

This policy complies with the requirements of the Protected Disclosures Act 2022, which has the objectives of:

- promoting the public interest by facilitating the disclosure and investigation of matters of serious wrongdoing (also known as Whistleblower) in or by an organisation.
- to provide protection to disclosers who reports concerns or make disclosures of serious wrongdoing in an organisation.
- See Definitions for disclosers and serious wrongdoing.

RMA GENERAL LIMITED is committed to a culture of corporate compliance, ethical behaviour and good corporate governance.

As part of this culture RMA GENERAL LIMITED is committed to maintaining an open working environment in which employees and contractors, can report instances of unethical, unlawful or undesirable conduct without fear of intimidation or retaliation.

The purpose of this policy is to:

- provide appropriate channels for reporting Unacceptable Conduct;
- encourage employees and contractors to disclose unacceptable Conduct

This policy is an important part of RMA GENERAL LIMITED compliance and corporate governance framework. RMA GENERAL LIMITED has adopted this policy to:

- help detect and address unacceptable Conduct;
- provide employees and contractors with a supportive working environment in which they feel able to raise issues of legitimate concern to RMA GENERAL LIMITED;
- increase efficiency by encouraging disclosure of conduct which, whilst may not be unlawful or unethical, is contrary to RMA GENERAL LIMITED interests (such as unsafe work practices or wastage of resources);
- compliment RMA GENERAL LIMITED other compliance policies and procedures, including its conflict management and breach reporting policies.

This policy applies to all Directors and Officers, employees and contractors (RMA GENERAL LIMITED Connected Persons).

If you do not understand any part of this policy or how it applies to you, you should ask your Manager.



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UNACCEPTABLE CONDUCT

Unacceptable Conduct includes any conduct (including an act or omission, or course of conduct) by an RMA GENERAL LIMITED Connected Person which:

- is dishonest, fraudulent or corrupt.
- is illegal, such as theft, drug sale/use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law.
- is unethical, such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching the RMA GENERAL LIMITED Code of Conduct.
- is potentially damaging to RMA GENERAL LIMITED or RMA GENERAL LIMITED Connected Persons, such as unsafe work practices or substantial wasting of company resources.
- may cause financial loss to RMA GENERAL LIMITED or damage its reputation or be otherwise detrimental to RMA GENERAL LIMITED interests.
- poses a risk to the health or safety of any individual; or
- involves any other kind of serious impropriety such as gross mismanagement, serious and substantial waste or repeated instances of a breach of internal procedures.

MAKING A REPORT

RMA GENERAL LIMITED encourages RMA GENERAL LIMITED Connected Persons to initially report any occurrences of Unacceptable Conduct to their manager or the persons can make a protected disclosure directly to an Appropriate Authority. When making a report, you should ensure that you have read and understand this Policy first.

For some types of Unacceptable Conduct, RMA GENERAL LIMITED established procedures provide more appropriate channels for dealing with issues. For example, for:

- discrimination, harassment, workplace grievance or performance appraisal issues – you should refer the matter to your manager or the Head of Human Resources or Managing Director.
- any other personal issue relating to your work or work environment – you should refer the matter to your manager; or
- issues relating to conflicts of interest as described in RMA GENERAL LIMITED Conflict of Interest - you should refer the matter to your manager or the Risk & Compliance Manager.

However, if at any time you are concerned that any of the above procedures are not working because of Unacceptable Conduct, you can raise your concern through the procedure outlined in this Policy.

If you think it would be inappropriate or counterproductive to report an instance of Unacceptable Conduct to your manager or in accordance with RMA GENERAL LIMITED other policies and practices, you can report the conduct to:

- the Managing Director or Head of Compliance;
- if you consider that the Head of Compliance is complicit in the Unacceptable Conduct, you may report the matter to the Chief Financial officer; or
- if for any reason you wish to make a report anonymously you may utilise the external reporting line identified in Appendix One (the Anonymous Reporting Service).



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If you make a report to the Anonymous Reporting Service, your identity will be secured unless you disclose your name as the service is not controlled by RMA GENERAL LIMITED but an independent party with whom RMA GENERAL LIMITED contracts to provide the confidential and anonymous reporting service. Any report made to the Anonymous Reporting Service will be sent on a de-identified and encrypted basis to the following parties simultaneously:

- the Chairman of the Board;
- at least one member of RMA GENERAL LIMITED Senior Management designated by the Board from time to time.

Before making a report under this policy you should do your best to ensure there is a reasonable basis for the report. This assists RMA GENERAL LIMITED to reduce the chance that this Policy is misused.

If you have a mere suspicion of Unacceptable Conduct which is not supported by evidence of any kind, this will not normally provide a reasonable basis for a report. To have a reasonable basis, you must have at least some credible evidence supporting your report. However, it is not your job to investigate or prove beyond doubt a case of Unacceptable Conduct.

INITIAL ASSESSEMENT

If you make a report under this Policy to your manager, they will review the report and make an initial assessment of whether your report needs further investigation. It is important at this stage if you wish your identity to be confidential that you inform your manager, and all reasonable steps will be taken to preserve confidentiality whilst recognising that RMA GENERAL LIMITED may be under legal obligations to act on the report and/or disclose details of the report to relevant regulators and/or in future litigation.

INVESTIGATING A REPORT

If your manager refers your report to the Head of Compliance for further assessment, the role of the Head of Compliance is to coordinate a fair, independent and discreet investigation into the substance of your report to determine whether there is evidence to support the matters raised. The Head of Compliance will advise the Chief Financial officer and the Board of any matter reported under this Policy that involves an allegation concerning:

- fraud;
- criminal misconduct;
- conduct that could cause significant reputational damage to the Company; or
- potential financial loss to the Company exceeding \$250,000.

If you have reported the matter to the Head of Compliance or Chief Financial officer and have requested that your identity remain confidential, all reasonable steps will be taken not to disclose your identity to anyone within RMA GENERAL LIMITED without your consent. It is recognised however that in some cases the nature of the report will be such that your identity will be difficult to keep confidential and that in these circumstances RMA GENERAL LIMITED encourages RMA GENERAL LIMITED Connected Persons to either identify themselves when making the report or utilise the Anonymous Reporting Service.

If you made your report to the Anonymous Reporting Service and the Chairman determines that the matter warrants further enquiry, RMA GENERAL LIMITED will ensure that the



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Chairman and his or her delegates have all necessary access to RMA GENERAL LIMITED records and personnel to undertake an appropriate investigation.

If your report raises allegations of Unacceptable Conduct against another person, it must be recognised that in the interests of procedural fairness, it may not be possible to adequately investigate a report of Unacceptable Conduct without that person being given the right to respond to the allegations.

Within 20 working days of receiving a protected disclosure report, the receiver either RMA GENERAL LIMITED or an appropriate person or authority will:

- acknowledge to the discloser the receipt of the disclosure
- consider whether it warrants investigation
- check with the discloser whether the disclosure has been made elsewhere (an any outcome)
- deal with the matter by doing one or more of:
 - investigating the disclosure
 - addressing any serious wrongdoing by acting or recommending action
 - referring the disclosure to an (or another) appropriate authority
 - deciding that no action is required, and
- inform the discloser (with reasons) about what the receiver has done or is doing to deal with the matter.

If the receiver is unable to complete these actions within 20 working days, they should undertake the first three steps and inform the discloser how long they expect to take to deal with the matter and keep the discloser updated on the progress.

OUTCOME OF INVESTIGATION

On completing an investigation, the Company will prepare a report on whether Unacceptable Conduct has occurred and if it has may recommend in the report what action should be taken. A receiver must inform the discloser, with reasons, if the receiver decides no action is required on the disclosure.

If the receiver refers the disclosure to an Appropriate Authority, the discloser must be consulted first.

If a discloser believes the disclosure is not be acted on as it should be, or the matter being dealt with to address the wrongdoing the discloser may make the disclosure to:

- an Appropriate Authority, including Ombudsman
- a Minister

RMA GENERAL LIMITED is committed to ensuring that any Unacceptable Conduct identified and rectified as far as practicable, and that action will be taken to prevent any future occurrence of the same or similar conduct.



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CONFIDENTIALITY

RMA GENERAL LIMITED will also ensure that any records relating to a report of Unacceptable Conduct are stored securely and are able to be accessed only by authorised staff.

RMA GENERAL LIMITED encourages anyone making a report under this policy to disclose their identity, to facilitate full and frank communication with them. Where a person prefers to remain anonymous and/or utilises the Anonymous Reporting Service they will be provided with an identification number which they can quote for the purposes of identifying themselves in subsequent contacts with the relevant RMA GENERAL LIMITED contact person.

Unauthorised disclosure of:

- the identity of a person who has made a report of Unacceptable Conduct, or
- information from which the identity of the reporting person could be inferred,

RMA GENERAL LIMITED may constitute an offence under the Companies Act. Apart from any criminal consequences, it will be regarded as a disciplinary matter and will be dealt with in accordance with the RMA GENERAL LIMITED Code of Conduct.

REPORTING PERSON INVOLVED IN THE UNACCEPTABLE CONDUCT

A person who has committed or been involved in Unacceptable Conduct will not be immune from disciplinary action merely because they have reported the Unacceptable Conduct in accordance with this policy. In these circumstances the reporting person will be dealt with in accordance with RMA GENERAL LIMITED Code of Conduct/disciplinary policies. However, the person's conduct in making the report will be considered in determining what disciplinary action is appropriate.

PROTECTION OF WHISTLEBLOWERS

RMA GENERAL LIMITED is committed to protecting and respecting the rights of RMA GENERAL LIMITED Connected Persons who report Unacceptable Conduct in good faith.

A Whistleblower and people who volunteer to provide supporting information is entitled to protection in accordance with the protected disclosure Act, even if they are mistaken and there is no serious wrongdoing.

Under the Act a disclosure of information is **protected** if the discloser/connected persons:

- believes on reasonable grounds that there is, or has been, serious wrongdoing in or by the discloser's organisation, and
- discloses information about that in accordance with the Act, and

does not disclose it in bad faith. RMA GENERAL LIMITED will not tolerate any discrimination, harassment, intimidation, retaliation, treatment that is less favourable or victimisation against any person suspected of making a report of Unacceptable Conduct, or against that person's colleagues, employer (if a contractor) or relatives. Any such retaliatory action will be treated as serious misconduct and will be dealt with in accordance with RMA GENERAL LIMITED Code of Conduct/disciplinary policies.

If you are subject to any such action, you should immediately notify Managing Director or Human Resources or Risk and Compliance Manager. If you consider that an anonymous process is necessary or that the matter should be brought to the attention of the Board, you may report the matter using the Anonymous Reporting Service, whether or not you chose to remain anonymous.

PUBLICATION AND REVIEW OF THIS POLICY

The Board of Directors along with the Risk and Compliance Manager will:

- ensure that this Policy is communicated to all Employees, contractors and connected persons;
- monitor and at least every three years review the effectiveness of the protection program described in this policy and will maintain adequate records and data for this purpose; and

If you have any questions about this Policy or its application, please refer to your manager or the Risk and Compliance Manager.

The relevant contact details for communications under this Policy are attached at [Appendix One](#).

DEFINITIONS

Under the Act,

Section 8 Meaning of **discloser**

An individual who is (or was formerly):

- an employee
- a homemaker within the meaning given in section 5 of the Employment Relations Act 2000
- a secondee to the organisation
- engaged or contracted under a contract for services to do work for the organisation:
- concerned in the management of the organisation (including, for example, a person who is or was a member of the board or governing body of the organisation)
- a volunteer working for the organisation without reward or expectation of reward for that work.

Section 10 Meaning of **serious wrongdoing** is an act, omission, or course of conduct that includes:

- an offence
- a serious risk to public health, or public safety, or the health and safety of any individual, or to the environment
- a serious risk to the maintenance of the law including the prevention, investigation, and detection offences or the right to a fair trial



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Schedule 2 provides a full list of examples for an **Appropriate Authority**, but is not limited to the Commissioner of Police, the Auditor-General, the Director of the Serious Fraud Office, the Inspector-General of Intelligence and Security, an ombudsman, the Parliamentary Commissioner for the Environment, the Police Complaints Authority, the Solicitor-General, the State Services Commissioner, the Health and Disability Commissioner, Membership body and the head of any public service organisation.

Policy approved by: Josh Adams Director RMA General Limited

Policy in effect from: November 2022

Policy to be reviewed by: 2025

Manager responsible for policy: Network Manager



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Appendix One Whistleblower Contact details

Internal Reporting

Managing Director	ENTER DETAILS
Managing Directors Name	ENTER DETAILS
Physical Address	
E: Managing Directors Email	ENTER DETAILS
D: Managing Directors Direct Dial	

The External Reporting Service

INCLUDE DETAILS ON HOW TO ACCESS THE EXTERNAL REPORTING SERVICE IF APPLICABLE.