



Mill Relining Systems

**DOCUMENT TYPE:**

**POLICIES**

Title: Whistleblower Policy  
Department: Company Secretarial – Governance & Compliance  
Relevant to: RME Global  
Revision: Every 2 years  
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## Whistleblower Policy

### REVISION HISTORY

DATE	REVISION	DESCRIPTION	AUTHOR
20 December 2019	Version 1	Sets the framework and provide guidance on how to raise a concern about suspected or actual unethical or unlawful behavior.	Caroline Edwards

### AUTHORISATION

AUTHOR		PROCESS OWNER	
Name:	Caroline Edwards	Name:	John Howard
Date:	20 December 2019	Date:	20 December 2019





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## 1 PURPOSE

RME is committed to conducting our business with honesty, fairness and integrity. We are committed to a culture where staff feel free to report or raise concerns. RME takes unlawful and unethical behavior very seriously. If you suspect something is not right, we encourage you to speak up as soon as possible.

The purpose of this policy is to encourage the reporting of any Reportable Conduct, outline the procedures to be followed, and set out the protections afforded to whistleblowers by the Board.

## 2 WHAT IS REPORTABLE CONDUCT

This policy applies to any who is employed by, acts for, or represents RME, including:

- Directors and Officers
- Employees (permanent, part-time or temporary)
- Contractors, suppliers and their employees
- Consultants, secondees (wherever located)
- RME operations, including its related bodies corporate

In this Policy, **Reportable Conduct** means conduct by any person who has business dealings with RME, whether actual, suspected, or intended which an individual suspects on reasonable grounds:

- is dishonest, fraudulent or corrupt, or involves bribery or corruption, or an improper state of affairs or otherwise amounts to an abuse of authority;
- is illegal, including theft, drug sale or use, violence, or threatened violence, harassment, intimidation, or criminal damage to property;
- is in breach of Commonwealth or state legislation or local authority by-laws;
- is unethical, including dishonestly altering company records or data, adopting questionable accounting practices, or the unauthorised disclosure of confidential information;
- breaches RME's Code of Conduct or other RME policies;
- is potentially damaging to RME, a RME employee or a third party, or the public or the financial system, such as unsafe work practices, environmental damage, health risks or substantial wasting of company resources;
- amounts to an improper state of affairs or circumstances, in relation to the tax affairs of RME, a related company or associated entity and this information may assist the recipient to perform their functions or duties in relation to those tax affairs;
- may cause financial or non-financial loss to RME, damage its reputation or be otherwise detrimental to RME's interests; or
- is an attempt to conceal or delay disclosure of any of the above conduct.

**Detrimental Action** means, but not limited to:

- action causing injury, loss or damage;
- intimidation or harassment; and
- discrimination, disadvantage or adverse treatment in relation to a person's employment, career, profession, trade or business, including the taking of disciplinary action.



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Reportable Conduct and Detrimental Action does not include conduct that is dealt with, and therefore more appropriately raised, under an alternative policy. This Policy should not be used for complaints relating to personal workplace grievances (such as the Code of Conduct Policy) or concerns which relate to individual working arrangements. Concerns of that nature should be raised by Employees and Officers with Human Resources and/or concerns should be raised with your Line Manager.

This Policy is not designed to replace normal communication channels between management and employees to address questions, concerns, suggestions or complaints. If employees have any concerns about what is proper conduct for themselves or others, it is expected they will raise their concern. In most instances, the employee's immediate supervisor is in the best position to address an area of concern. Serious matters or matters not satisfactorily resolved should be escalated through appropriate management channels in the normal course of business.

### 3 RESPONSIBILITIES

Everyone associated with RME is expected to adhere to acceptable and ethical standards, including the compliance with all laws, and this in turn helps RME to achieve its commitment to a culture of integrity, ethical and honest behaviour. Achieving this commitment requires all Employees who become aware of any actual or suspected Reportable Conduct, to report what they know or suspect according to the procedures set out below.

A Whistleblower who has not him or herself engaged in serious misconduct or illegal conduct may be provided with immunity from disciplinary proceedings. RME cannot provide immunity from civil penalties or criminal prosecution. Before conduct is reported, the Whistleblower must have reasonable grounds to suspect that Reportable Conduct has occurred. Individuals must not make baseless reports or knowingly provide false or misleading information regarding Reportable Conduct or Detrimental Action. Doing so may result in disciplinary action up to and including termination of employment.

### 4 REPORTING PROCEDURE

4.1 Anyone who has reasonable grounds to suspect Reportable Conduct, should report the conduct via one of the following channels:

- (a) to their direct line manager. The manager will then escalate the matter to the designated Whistleblower Disclosure Officer (WDO); or
- (b) directly to Stopline (the designated Whistleblower Service), a confidential, independent provider of whistleblowing services who will take full details of your concerns via telephone, mail, email, fax or the specifically created website.

**Phone: 1300 30 45 50**

**Website & Online Reporting Form:** <https://rmeglobal.stoplinereport.com>

**Stopline** will review reports and direct those that require further investigation to the Whistleblower Disclosure Officers at RME.

- (c) Whistleblower Disclosure Officer (WDO)

John Howard    Company Secretary and CFO

Email: [john.howard@rmeglobal.com](mailto:john.howard@rmeglobal.com)

Phone: +61 7 46 989 158

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**Whistleblower Disclosure Officer (WDO)**

Peter Rubie      Non-Executive Director  
Email:            [peter.rubie@rmeglobal.com](mailto:peter.rubie@rmeglobal.com)  
Phone:            +61 7 46 989 129  
Mobile:           +61 4 10 262 003

- 4.2 The WDOs are responsible for overseeing the development and implementation of this policy and RMEs whistleblower initiatives and encouraging reporting of policy breaches. They are also responsible for informing the Board of all investigations. If the Whistleblower wishes to remain anonymous, he or she may do so.
- 4.3 Employees may remain anonymous when making a report, however anonymity can reduce the extent to which some matters can be investigated, and may prevent the person lodging the report from being kept updated as to the progress or outcome of the investigation.
- 4.4 While RME will take all reasonable efforts to ensure anonymity is maintained, employees lodging anonymous reports should be aware that if the matter is eventually heard in court, anonymity may be lifted in limited circumstances by a court order.
- 4.5 Employees lodging anonymous reports should also be aware that the whistleblower protections afforded by the Corporations Act, do not extend to complainants who choose to remain anonymous (i.e. your name must be provided before or at the time of making the report).

## **5 INVESTIGATION**

- 5.1 RME will investigate all cases of Reportable Conduct lodged in accordance with this policy. The report will be investigated fairly, thoroughly and objectively, and will be done so in a reasonably timely manner.
- 5.2 Where appropriate, and where allowed by legal or confidentiality restraints, RME may notify the outcome of the investigation to the employee who reported the matter (where possible).

## **6 WHISTLEBLOWER PROTECTION**

- 6.1 RME is absolutely committed to ensuring all persons who make a report in accordance with this policy are afforded absolute confidentiality and fairness and are not subject to any detrimental, recriminatory, harassing or unfavourable treatment for lodging a report in good faith.
- 6.2 Unless required by law, a court, or as consented to by the person making the report, the identity of the person making the report, and all of the information they disclose, shall be treated with absolute confidentiality by the manager receiving the report and/or the Whistleblower Disclosure Officers.

This continued confidentiality includes when the receiver is reporting the matter to senior management, the Board, or legal advisors. Where, for the purposes of investigation, the identity of the person is required to be disclosed, it will not be done without the whistleblower's consent and the whistleblower may request a leave of absence or to be relocated during the investigation in those circumstances. Any notes, records or files created as part of the reporting shall be retained under similarly strict confidentiality.

- 6.3 Should any breach of the confidentiality requirements set out above occur by any Employees, these will be regarded as a serious breach of their employment conditions, and may result in disciplinary action including termination.
- 6.4 In cases of vexatious, baseless or trivial reports where there are no reasonable grounds for suspicion, the protections afforded to the whistleblower may not be available.



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## **7 WHISTLEBLOWER PROTECTION UNDER THE CORPORATIONS ACT**

- 7.1 The Corporations Act affords protection to whistleblowers where the following conditions are met:
- (a) they are an officer or employee of RME, or a contractor or employee of a contractor to RME; and
  - (b) they make a report to:
    - (i) a Protected Disclosure Officer;
    - (ii) a director, officer, or senior manager of RME;
    - (iii) the external auditor of RME; or
    - (iv) ASIC; and
  - (c) they do not remain anonymous, and give their name before or at the time of making the report; and
  - (d) the report is made in good faith, and on reasonable grounds indicating that RME or a RME officer may have breached the Corporations Act or the Australian Securities and Investments Commission Act 2001 (Cth).
- 7.2 Where these conditions are met:
- (a) the whistleblower is protected from any legal liability by making the report;
  - (b) should they suffer any detrimental, recriminatory, harassing or unfavourable treatment for lodging a report, the whistleblower can claim compensation for that damage from the offender, who may also be liable for a criminal offence; and
  - (c) if the person receiving the report discloses anything which may give away the whistleblower's identity (other than as required by law, the police, or ASIC), they too may be guilty of an offence.

## **8 MISCELLANEOUS**

- 8.1 Review of policy
- (a) External reviews of this policy may be undertaken at the request of the Board.
  - (b) A copy of this policy (or a summary of it) will be made available on RME's website.
- 8.2 Further guidance
- If you require further guidance as to this policy, please contact RME's Company Secretary on:
- T: +61 7 46 989 158
- M: +61 4 27 763 808
- 8.3 Endorsement
- (a) RME is committed to this policy and its implementation throughout RME.
  - (b) This policy was adopted by the Board on 19 December 2019.





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## 9 DEFINITIONS AND INTERPRETATION

### 9.1 Definitions

In this policy:

Term	Definition
Board	means the Board of Directors of the Company.
Company Secretary	Company Secretary of the Board of Directors
Company or RME	means RME Holding Pty Ltd and any subsidiary or related body corporate.
Corporations Act	means Corporations Act 2001 (Cth).
Director Employee	means a Director of the Company.
Reportable Conduct	has the meaning set out in section 2 of this policy.
Detrimental Action	has the meaning as set out in section 2 of this policy.
Whistleblower Disclosure Officers (WDO)	has the meaning as set out in section 4 of this policy.
Stopline	a confidential, independent provider of whistleblowing services

