



**For the better**

# **Whistleblower Policy**

<b>Policy Number:</b>	RC6		
<b>Applicable Legislation</b>	Corporations Act 2001 (Cth), Taxation Administration Act 1953 (Cth) Insurance Act 1973 (Cth), Relevant ASIC Regulatory Guide, and APRA Prudential Standards		
<b>Associated Document(s):</b>	RAC Code of Conduct RAC Fraud Policy RAC Insurance Fit and Proper Policy RAC Risk Management Framework RAC Conflicts of Interest Policy		
<b>Whistleblower Framework Responsible Executive</b>	Chief Financial Officer		
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## Table of Contents

1. Purpose .....	4
2. Guiding Principles .....	4
3. Who does this policy apply to? .....	5
4. RAC's Obligations and Commitments .....	5
5. What can be reported under this policy? .....	5
6. What cannot be reported under this policy?.....	6
7. Public Interest or Emergency Disclosures.....	7
8. What are the protections under Whistleblower Laws?.....	8
9. Support and fair treatment.....	10
10. Review of Whistleblower Policy.....	10
11. Definitions.....	11
Annexure A – How to make Whistleblower Report and Find out more information.....	13

## 1. Purpose

RAC is committed to transparency and to building an environment in which people feel free to raise legitimate issues relating to RAC's operations. RAC encourages the reporting of any instances of suspected unethical, illegal or fraudulent conduct involving RAC's businesses or Employees, and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

This Policy explains how you can report such concerns, the protections that will apply to you (and others), how your concerns will be investigated, what you can expect, and other sources of information that may be helpful to you in reporting your concerns.

## 2. Guiding Principles

- **Speak Up and Report**

If you are a current Employee of RAC, please consider whether you would prefer to report your concern via another channel such as your line manager, your manager once removed, Risk & Compliance, Legal, Health and Safety or People & Capability teams.

- **Protection from Detrimental Conduct**

RAC does not tolerate detrimental conduct that causes or is intended to cause harm to you because of the fact that you or someone else has made, or intend to make, or are suspected as having made a report.

- **Confidentiality and Consent**

RAC will maintain confidentiality of all reports made under this Policy and your identity as a reporter to the fullest extent possible. While RAC encourages you to identify yourself to the Whistleblower Program, you can also report on an anonymous basis.

- **RAC's expectations of you**

RAC expects you to act honestly and ethically, and to make a report on reasonable grounds.

- **Investigations and Outcomes**

All investigations will be conducted in a timely manner, in accordance with the principles of fairness and natural justice and appropriately documented. Where appropriate, and able to do so, RAC will update you on the status and outcome of your report.

- **Higher Standard**

This Policy is designed to comply with RAC's legal obligations. If anything in this Policy is inconsistent with any law imposed on RAC, that legal obligation or the "higher standard" will prevail over this Policy.

- **Regulators**

You have the right to communicate with regulators and law enforcement authorities at any time in relation to your concerns or any matter relating to this Policy.

### **3. Who does this policy apply to?**

This Policy, and supporting procedures, applies to Councillors, RAC Directors, Employees, and other persons described in this policy as 'Eligible Whistleblower' or 'Eligible Recipient' (see 'Definitions' section 12), but it does not apply to members or customers of RAC (unless they are also Eligible Whistleblowers or Eligible Recipients).

### **4. RAC's Obligations and Commitments**

RAC will:

- provide this Policy to Employees as part of their onboarding;
- provide training to Eligible Recipients in the receiving and handling of disclosures;
- undertake general Whistleblower awareness training as part of onboarding, and biennial refresher training; and
- provide the mechanisms for an Employee to raise a concern, anonymously if required, with an independent service provider.

It is a condition of employment with, or engagement by, RAC that all Employees, Officers, Councillors, Directors and contractors comply with this Policy.

This Policy will be made available to Officers and Employees through RAC's intranet and website.

### **5. What can be reported under this policy?**

You are encouraged to make a report of any disclosable matter under this Policy ('Disclosable Matter').

Disclosable matters involve information that you have reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to RAC. This includes information that indicates that RAC, or any of its officers or employees, has engaged in conduct that:

- a) constitutes an offence against any of the laws relating to financial services regulation in Australia;
- b) constitutes an offence against any other Commonwealth law that is punishable by imprisonment for 12 months or more;
- c) indicates misconduct or an improper state of affairs or circumstances in relation to tax affairs of the entity;
- d) represents a danger to the public or the financial system, even if it doesn't involve a breach of a particular law; or
- e) contravenes regulations.

'Misconduct' includes fraud, negligence, default, breach of trust and breach of duty.

'Improper state of affairs or circumstances' covers a broad range of circumstances and does not necessarily involve unlawful conduct. It can indicate a systemic issue that should be brought to a regulator's attention or may relate to business behaviours or practices that may cause consumer harm.

Some examples of such conduct include:

- dishonest, fraudulent, corrupt or illegal behaviour;
- unethical or improper conduct or behaviour;
- conduct or an activity that endangers the health & safety of any person;
- conduct that is considered a significant danger to the environment;
- coercion, harassment or discrimination by, or affecting, an Employee;
- a repeated intentional breach of RAC policy or procedures;
- gross mismanagement or misuse of RAC assets;
- conduct that is contrary to RAC's Code of Conduct;
- a breach of any legislation or code relating to RAC's operations or activities;
- improper or misleading accounting and financial reporting practices; or
- conduct that compromises the integrity of RAC systems or the data held in them.

You can still qualify for protection even if your disclosure turns out to be incorrect.

## **6. What cannot be reported under this policy?**

This Policy does not apply to disclosures relating to:

- Personal work-related grievances that relate to your current or former employment with RAC and have implications for you personally, but are not otherwise a Disclosable Matter, including:
  - (a) an interpersonal conflict between you and another employee;
  - (b) a decision that does not involve a breach of workplace laws;
  - (c) a decision about your engagement, transfer or promotion;
  - (d) a decision about the terms and conditions of your engagement; or
  - (e) a decision to suspend, terminate or discipline you.

Work-related grievances are to be raised either directly with your leader, their manager or your HR Business Partner.

- A personal work-related grievance may still qualify for protection if:
  - it also includes information about misconduct (i.e., it's a mixed report);
  - RAC 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 your personal circumstances;
  - you suffer from, or are threatened with, detriment for making a disclosure; or
  - you are seeking legal advice about the operation of the whistleblower protections under the Corporations Act.
- Any actual or suspected misconduct including operational fraud committed by RAC members or customers (e.g. fraudulent insurance claims, fraudulent loan applications etc).

For any Insurance matters contact the Technical Claims Unit, for all other suspected member related fraudulent activity contact Group Risk and Compliance; and

- Member complaints, including any matters relating to the delivery of products and services. For member related feedback contact [member.relations@rac.com.au](mailto:member.relations@rac.com.au)

Disclosures that are not about Disclosable Matters do not qualify for whistleblower protection under the Corporations Act or the Tax Administration Act.

## 7. Where to lodge a report

A Whistleblower can raise a Whistleblower Report under this Policy by reporting the matter to any of the following:

- The confidential external Whistleblower service provided by Stopleveline:

<b>Telephone:</b>	1300 30 45 50 (Australia only)
<b>Email:</b>	<a href="mailto:makeareport@stopleveline.com.au">makeareport@stopleveline.com.au</a>
<b>On-line:</b>	<a href="https://rac.stoplevelinereport.com/">https://rac.stoplevelinereport.com/</a>
<b>Mail:</b>	RAC c/o Stopleveline, PO Box 403, Diamond Creek, VIC 3089
<b>APP:</b>	StoplevelineSmart phone APP (free download from the Apple iTunes store and Google Play)

- RAC's President or Chair of RACWA Holdings:
  - President, John Driscoll, email [racclubpresident@rac.com.au](mailto:racclubpresident@rac.com.au)
  - Chair, Jim Walker, email [jimwalker@walkerjim.com](mailto:jimwalker@walkerjim.com), mobile 0459 041 052

Disclosures of information relating to Disclosable Matters can also be made to the following bodies;

- ASIC,
- APRA,
- The ATO, Tax Practitioners Board, Inspector-General of Taxation - where the disclosure relates to Taxation matters,
- Or another Commonwealth body prescribed by regulation and still qualify for protection under the Corporations Act or the Tax Administration Act (as appropriate).

Disclosures made to a legal practitioner for the purposes of obtaining legal advice in relation to whistleblower protections are also protected under this policy (even if the legal practitioner decides that the disclosure does not relate to a Disclosable Matter).

## 8. Public Interest or Emergency Disclosures

"Public interest disclosures" and "emergency disclosures" are disclosures that can be made to a journalist or parliamentarian and still qualify for protection.

It is important for a potential Whistleblower to understand the criteria for making these disclosures.

**A Whistleblower should contact an independent legal advisor before making a public interest disclosure or an emergency disclosure.**

### **Public Interest Disclosure**

A Whistleblower who has already made a disclosure to either ASIC, APRA or another Commonwealth body prescribed by legislation can make a public interest disclosure if:

- at least 90 days have passed since the disclosure was made;
- the Whistleblower does not have reasonable grounds to believe action is being taken or has been taken;
- the Whistleblower has reasonable grounds to believe it is in the public interest to make an additional disclosure; and
- before making the Public Interest Disclosure they have provided written notice to the body to which the previous disclosure was made of their intent to make a Public Disclosure.

### **Emergency Disclosure**

A Whistleblower who has previously made a disclosure to ASIC, APRA or another Commonwealth body can make an emergency disclosure if:

- the Whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of people or the natural environment;
- before making the emergency disclosure they have provided written notice to the body to which the previous disclosure was made of their intent to make an emergency disclosure; and
- The extent of the information provided in the emergency disclosure is no greater than is required to inform the journalist or parliamentarian of the substantial and imminent danger.

## **9. What are the protections provided to a Whistleblower?**

If you make a report in accordance with this Policy, you will be entitled to protections under the Corporations Act. These protections apply to internal disclosures and to disclosures made to legal practitioners, internal and external auditors, regulatory and other bodies, and to public interest and emergency disclosures that are made in accordance with the Corporations Act. They include the following:

### Identity protection

- RAC will be legally obliged to protect the confidentiality of your identity.
- RAC cannot disclose your *identity* or any information that is likely to identify you (which has been obtained because you made a disclosure under this Policy) without your consent, except:
  - to ASIC, APRA or a member of the Australian Federal Police;
  - to a legal practitioner for the purposes of obtaining advice about whistleblowing provisions in the Corporations Act; or
  - to a person or body prescribed by regulations.
- RAC can disclose the *information* you give us without your consent if:
  - the information does not include your identity;
  - RAC has taken all reasonable steps to reduce the risk that you will be identified from the information; and

- it is reasonably necessary for investigating the issues raised in your disclosure.

**Outside the exceptions listed above, it is illegal for a person to identify a Whistleblower or disclose information that is likely to lead to their identification.**

If you believe your identity has been disclosed you can lodge a complaint with either RAC's President or the Chair (see Annexure A for contact details). Additionally, you may lodge a complaint with a regulator such as ASIC, APRA or the ATO for investigation.

#### How RAC will protect your anonymity

- You may choose to remain anonymous when communicating with Stoptline on the phone or by email.
- You may choose to adopt a pseudonym when making your disclosure to internal RAC parties. This might be appropriate in circumstances where, for example, your identity is known to your Manager or the WPO but you prefer not to have it disclosed to others.
- You can choose to remain anonymous or adopt a pseudonym while making a disclosure, over the course of the investigation and after the investigation is finalised. You may refuse to answer questions that you feel could reveal your identity during follow-up conversations.
- In instances where a disclosure is made to RAC via an email address or by phone where the identity cannot be determined and the Whistleblower has not identified themselves within the email or on the phone, RAC will treat this disclosure as anonymous.

#### Protection from detrimental conduct

- A person cannot cause (or threaten to cause) detriment to you or another person because they believe or suspect that you have made, may have made, or could make, a disclosure that qualifies for protection under this Policy. A threat can be expressed or implied, conditional or unconditional and you do not have to actually fear that the threat will be carried out.
- The following are examples of detrimental conduct:
  - dismissal;
  - changing your position or duties to your disadvantage;
  - discriminating between you and other employees;
  - harassment or intimidation;
  - harm or injury (including psychological harm); and
  - damage to your property or reputation.
- The following are **not** examples of detrimental conduct:
  - reasonable administrative actions taken to protect you from detriment (e.g. moving you to a different work area or changing your reporting line if you made a disclosure relating to a manager); and
  - managing any separate performance issues that affect your work.
- Disciplinary action may be taken against anyone who subjects you to detrimental treatment as a result of a legitimate disclosure under this Policy.

You are encouraged to seek legal advice as you may be entitled to seek compensation and other remedies through the courts if:

- you suffer loss, damage or injury because of a disclosure; and
- RAC failed to prevent a person from causing the detriment or did not afford you protections as required by this Policy.

This Policy may not protect you if you are also involved in, or connected to, the improper conduct or illegal activity that is being reported.

## **10. Support and fair treatment**

RAC will provide the following support to anyone making a report under this policy, as required and appropriate:

- connecting you (as well as any other Employees affected by the disclosure, should they require it) with the Employee Assistance Program;
- appointing an independent support person from the Human Resources Team to deal with any ongoing concerns you may have; or
- connecting you to third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636).

Any investigation has the potential to damage the career prospects and reputation of people who are the subject of a Whistleblower disclosure. If the disclosure mentions or relates to Employees of RAC other than you, RAC will take steps to ensure that those individuals are treated fairly. This would include:

- handling disclosures confidentially, objectively, fairly and independently;
- assessing each disclosure on its merits and seeking evidence to support allegations;
- notifying an Employee who is the subject of a disclosure about the subject matter of that disclosure at the appropriate time to ensure natural justice and procedural fairness by giving that Employee a chance to respond; and
- providing the affected person with access to support services, if required.

## **11. Review of Whistleblower Policy**

The Group Compliance Manager is responsible for administering, implementing and reviewing this Policy. This Policy is to be reviewed on a triennial basis, or earlier as required.

## 12. Definitions

### **Accountable Person:**

- meet the criteria and hold a responsibility under s.10 of the Financial Accountability Regime Act 2023 (Cth) or;
- hold one or more of the responsibilities in relation to or positions in the accountable entity under the Minister rules.
- Please refer to People and Capability or RAC Insurance Risk and Compliance for a current list of Accountable Persons.

**ASIC** means the Australian Securities & Investments Commission.

**APRA** means the Australian Prudential Regulation Authority.

**Councillor** means a member of the council of the Royal Automobile Club of W.A. (Incorporated).

**Director** means a director of an RAC entity.

**Disclosable Matter** means a matter that is disclosable under section 5 of this Policy.

### **Eligible Whistleblower**

Includes anyone who is, or has been, any of the following in relation to RAC:

- An employee of RAC ((including permanent, part-time, fixed-term or temporary, interns, secondees and managers);
- a Director or other Officer (e.g. a company secretary) of an RAC company;
- a RAC Contractor, consultant, supplier or service provider (or one of their Employees or subcontractors), whether paid or unpaid;
- an associate of RAC; and
- a relative, spouse or dependent of one of the above

### **Eligible Recipient**

The role of an Eligible Recipient is to receive disclosures that qualify for protection under this policy. It includes any of the following, as employed or engaged by RAC:

- Officers (defined as someone who has the capacity to significantly affect the financial standing of RAC);
- Directors;
- Councillors;
- Senior Managers;
- Internal or external auditors (or member of an audit team conducting an audit); or
- Actuaries.

**Financial Accountability Regime 2023 (Cth) Act (FAR)** means the accountability regime regulated by ASIC and APRA to improve accountability standard in entities regulated by APRA.

**RAC** means The Royal Automobile Club of W.A. (Inc.), RACWA Holdings Pty Ltd and each of its related bodies corporate and its subsidiaries, excluding St Ives Group Pty Ltd.

**Whistleblower Investigation Officer (WIO)** is the Group Risk Manager and / or the Head of Risk, RAC Insurance Pty Limited, or in their absence, such other person as approved by the Group Chief Financial Officer

**Whistleblower Protection Officer (WPO)** is the RACWA Holdings Company Secretary, and / or RAC Insurance's Company Secretary, and/or General Manager Legal & Governance, or in their absence, such other person as approved by the Group Chief Financial Officer

**The process for reporting matters (including persons to whom matters can be reported) is set out in Annexure A.**

## Annexure A – Finding out more Information and How to make Whistleblower Report

<b>Find out more information</b>
If you wish to obtain additional information before reporting please speak to the WPO or RAC’s external Whistleblower service, Stopline.
<b>Consider Alternative Reporting</b>
<p>Prior to reporting a matter under this Policy a Whistleblower should consider whether the concern can be more appropriately escalated through:</p> <ul style="list-style-type: none"><li>- A Line Manager, or Manager once removed.</li><li>- Another senior manager, including Health &amp; Safety, People/HR, Risk &amp; Compliance or Legal.</li><li>- Any other Eligible Recipient, as specified in this Policy.</li></ul> <p>NOTE: To ensure the Whistleblower is afforded the protections under this Policy they must state that any report raised with an Eligible Recipient is a Whistleblower report.</p>
<b>Raising a report</b>
<p>You can choose to remain anonymous or adopt a pseudonym while making a disclosure, over the course of the investigation and after the investigation is finalised. You may refuse to answer questions that you feel could reveal your identity at any time, including during follow-up conversations.</p> <p>If you wish to remain anonymous, we suggest that you maintain ongoing two-way communication with RAC so that RAC can ask follow-up questions or provide you with feedback about the progress of your report.</p> <p>If you choose to remain anonymous you will still be protected under the Corporations Act 2001.</p> <p>A Whistleblower can raise a Whistleblower Report, under this Policy, by reporting the matter to any of the following:</p> <ul style="list-style-type: none"><li>• The confidential external Whistleblower service provided by Stopline:<ul style="list-style-type: none"><li><b>Telephone:</b> 1300 30 45 50 (Australia only)</li><li><b>Email:</b> <a href="mailto:makeareport@stopline.com.au">makeareport@stopline.com.au</a></li><li><b>On-line:</b> <a href="https://rac.stoplinereport.com/">https://rac.stoplinereport.com/</a></li><li><b>Mail:</b> RAC c/o Stopline, PO Box 403, Diamond Creek, VIC 3089</li><li><b>APP:</b> StoplineSmart phone APP (free download from the Apple iTunes store and Google Play)</li></ul></li></ul>

- RAC’s President or Chair of RACWA Holdings:
  - President, John Driscoll, email racclubpresident@rac.com.au
  - Chair, Jim Walker, email jimwalker@walkerjim.com, mobile 0459 041 052

If a Whistleblower is unable to use any of the above reporting channels, a disclosure can be made to:

- An Eligible Recipient; or
- A Regulatory Authority, such as ASIC or APRA,
- The ATO, Tax Practitioners Board, Inspector-General of Taxation - where the disclosure relates to Taxation matters,
- Or another Commonwealth body prescribed by regulation and still qualify for protection under the Corporations Act or the Tax Administration Act (as appropriate).

An Eligible Recipient may direct the Whistleblower to make the report to the external Whistleblower service, or to the WPO, if they consider it appropriate in the circumstances.

NOTE: To ensure the Whistleblower is afforded the protections under this Policy they must state that any reports raised with an Eligible Recipient is a Whistleblower report.

**Reports concerning the CEO, WPO and/or WIO**

If a report involves, one, or all, of, the CEO, WPO or WIO, the report will be directed to the Chair of RACWA Holdings for investigation and further action.

**Investigation**

All complaints through the Whistleblower process, will be managed by the WPO (unless inappropriate or otherwise agreed). If a conflict has been identified in the WPO’s fulfillment of their role, these tasks may be delegated to an alternative senior manager or independent consultant for any particular complaint.

The WPO and WIO will act independently of each other and the responsibilities of these roles will not reside with one person. Investigations will generally be undertaken or co-ordinated by the WIO. The WIO may use an external investigator to conduct the investigation, either in conjunction with the WIO or independently. The WIO may also use an external expert to assist with an investigation if deemed necessary.

You can report your concerns anonymously; however, we will not be able to follow up with you for further information. You will still qualify for the whistleblower protections.

Each Whistleblower Report will be assessed to determine whether:

- it qualifies for protection;
- a formal, in-depth investigation is required; and
- the report implicates an accountable person (AP) under the Financial Accountability Regime 2023 (Cth) Act (FAR).

Once a Whistleblower Report is received the WPO will:

- assess if the report falls within the scope of this policy. If determined to be a Whistleblower Report, commence addressing the matter within 5 business days.

- assess the risk of detriment to the Whistleblower and provide appropriate support.
- determine if the report is more appropriately investigated by an external investigation provider.
- advise the Whistleblower within 5 business days on how it will be investigated (provided the Whistleblower has provided contact information).
- Notify the relevant CEO and Chairs of the board and relevant Board Audit Committee.
- Notify the Insurance WPO if report relates to an Accountable Person.
- Consult with the WIO and/or other experts to seek guidance to determine the best way to handle the matter.
- Where appropriate, provide regular progress updates on the status of the investigation, at a minimum on commencement of investigation, progress and completion of investigation.

**Note: Eligible Recipients are to contact the WIO to obtain a copy of an investigation checklist.**

### **Record Keeping and Confidentiality**

The WIO and WPO will keep a secure record of any documents relating to their investigation with access limited to those with a direct involvement in the investigation.

All investigations will be conducted in a fair and independent manner and all reasonable efforts will be made to preserve confidentiality of an investigation. This means that:

- Any person affected by the investigation should have the opportunity to put their case and be aware of the allegations and evidence against them;
- The investigator will obtain specialist, independent advice on matters outside the knowledge or expertise of the investigator and all RAC Employees are required to assist the investigator to the maximum possible extent in carrying out investigations; and
- Investigations will be carried out as fast as reasonably practicable and with a degree of confidentiality consistent with the seriousness of the allegations.

It is illegal for any person to disclose information that either identifies, or is likely to identify, a Whistleblower outside of the below exceptions.

The Whistleblower is required to keep confidential their report (subject to any legal requirements) to avoid jeopardising an investigation.

### **Disclosure**

Any disclosure of the content of the Whistleblower Report will only be permitted if:

- The Whistleblower consents; or
- The disclosure is made to ASIC, APRA, ATO (where relating to a tax matter), the Australian Federal Police, a legal practitioner or a person or body permitted by the Whistleblower Regulations; or
- The information does not include the Whistleblower's identity; and
- All reasonable steps are taken to reduce the risk that the Whistleblower's identity can be determined from the information; and
- It is reasonably necessary for investigating the issues raised.

The WIO will liaise as necessary with the WPO and will keep the WPO abreast of the progress of the investigation.

### **Reporting of Incident and Outcome**

The WIO will prepare an anonymized report on the outcome of the investigation, making recommendations in relation to the subject of the complaint, and on any remedial action needed to guard against similar future occurrences.

The Report will be provided to the WPO, senior management and the relevant CEO and Chair of the Group Audit & Risk Committee or RAC Insurance Pty Ltd Board Audit Committee as appropriate depending on the nature of the Whistleblower Report.

The WIO must determine whether the report and investigation findings relate to an AP of RAC Insurance Pty Ltd or RAC Insurance Pty Ltd as an entity under the FAR. If either is implicated or may be implicated a report must be provided to the Insurance WIO (if not already aware). In providing the report, the confidentiality of the Whistleblower must be protected and only the facts of what has occurred entered.

Broader trends identified through Whistleblower Reports will be addressed and mitigated in line with RAC's Risk Management Framework. Where the trend relates to RAC Insurance, Accountable Persons or RAC Insurance employees the RAC Insurance Risk Management Framework will be used.

There may be circumstances where it is not appropriate to share the final outcome of the Investigation with the Whistleblower.