



For the better

Whistleblower Policy

PolicyNumber:	RC6		
Associated Document(s):	RAC Code of Conduct RAC Fraud Policy RAC Insurance Fit and Proper Policy RAC Risk Management Framework		
Policy Owner:	RAC Group Company Secretary		
Document Owner:	<i>Executive Manager Risk & Compliance</i>		
Approved By:	Name: Group Audit & Risk Committee		
Current Version	Approved By	Approval Date	Effective Date
1.2	Group Audit & Risk Committee	6 December 2019	6 December 2019
Previous Version(s)			
1.1	Group Audit & Risk Committee	14 August 2018	14 August 2018
1.0	Group Audit & Risk Committee	11 August 2015	November 2015

Table of Contents

1. Purpose & Objective	3
2. Policy Application.....	3
3. Reporting of Disclosable Matters	3
4. Protection, Anonymity and Confidentiality	4
5. RAC's Obligations and Commitments	5
6. Review of Whistleblower Policy.....	5
7. Definitions.....	5
Annexure A	6

1. Purpose & Objective

At RAC, our purpose is to protect and enhance the lifestyle of our members by offering products and services and investing in initiatives that help make life better for our members in WA.

We are for Western Australians, this means:

- Ensuring we contribute to a safe, sustainable and connected future for WA
- Providing products and services of value and relevance to our members
- Being open, responsive and fair in the way we conduct our business
- Responding to member feedback.

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.

2. Policy Application

This Policy, and supporting procedures, applies to all Employees of the RAC.

This Policy is subject, where relevant, to the whistleblowing provisions in the Corporations Act 2001 (Cth), the Taxation Administration Act 1953 (Cth), the Insurance Act 1973 (Cth), the relevant ASIC Regulatory Guide, APRA Prudential Standards and RAC Insurance's Fit & Proper Policy.

This Policy does not apply to:

- any actual or suspected misconduct including operational fraud committed by RAC members or customers (e.g. fraudulent insurance claims, fraudulent loan applications etc.);
- personal work-related grievances unless it has resulted in detriment, or threat of detriment, to the Whistleblower (e.g. an interpersonal conflict between the Whistleblower and another Employee is not covered under this Policy, however, threatened disciplinary action for lodging a Whistleblower Report would be covered);
- decisions about the engagement, transfer or promotion of an employee; or
- decisions about the terms and conditions of engagement of an employee.

3. Reporting of Disclosable Matters

You may make a report under this Policy if you have reasonable grounds to suspect that an Employee (or other person who has business dealings with RAC) has engaged in contravention of a law or inappropriate conduct, for example:

- 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 the RAC 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.

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

4. Protection, Anonymity and Confidentiality

If you make a report in accordance with this Policy, you will be entitled to the following protections:

- you will be immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure;
- no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against you for making the report;
- in some circumstances, the reported information is not admissible against you in criminal proceedings or in proceedings for the imposition of a penalty;
- anyone who causes or threatens to cause detriment to you or another person in the belief or suspicion that a report has been made, or may have been made, may be guilty of an offence and may be liable for damages;
- your identity cannot be disclosed to a Court or tribunal except where considered necessary;
- the person receiving the report commits an offence if they disclose the substance of the report or your identity either without your consent or contrary to the requirements set out in Step 3 of Annexure A; and
- you will not be discriminated against or disadvantaged in your employment or engagement with RAC, even if the report is subsequently determined to be incorrect or not substantiated.

All reasonable steps will be taken to ensure that you will not be subject to any form of detrimental conduct. Examples include victimisation, discrimination, harassment, demotion, alterations of duties, damage to property or reputation and dismissal or prejudice.

Disciplinary action may be taken against anyone who subjects you to victimisation, discrimination, bias, harassment, demotion, or dismissal as a result of your legitimate reporting of a matter under this Policy.

RAC will provide the following support if required and appropriate:

- connecting you 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).

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.

In some circumstances it may be difficult for RAC to properly investigate anonymous reports. If authorities take further legal action on the reported matter, it may become necessary for you to

identify yourself. If you wish to benefit from statutory protections provided to whistleblowers (for example, under the Corporations Act 2001), you may also have to disclose your name. In these instances, RAC will continue to ensure that you are protected from reprisal, intimidation, fear or disadvantage.

If you believe your identity has been disclosed, you can immediately report the incident to either the RAC President or the Chairman, (see Annexure A for contact details), for investigation.

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.

5. 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 annual refresher training;
- 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 the RAC intranet and the RAC website.

6. Review of Whistleblower Policy

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

7. Definitions

Director means a director of an RAC entity.

Employee includes any

- (i) current or former employee of RAC, including a councillor, director of officer,
- (ii) contractors, suppliers, consultants, and agents (including their employees); and
- (iii) the relatives, dependants or spouses of those individuals referred to at (i) and (ii) above.

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 refers to any person who reports a matter under this Policy.

Whistleblower Investigation Officer (WIO) is the Executive Manager Risk and Compliance and / or the Head of Risk, RAC Insurance Pty Limited.

Whistleblower Protection Officer (WPO) is the Executive Manager Legal & Governance and / or the RAC Insurance Legal Manager.

Annexure A – Submitting a Whistleblower Report

STEP 1 Consider	<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"> - A Line Manager, or Manager once removed. - Another senior manager, including Health & Safety, People/HR, Risk & Compliance or Legal. - Any other responsible persons, as specified in this Policy. <p>If you wish to obtain addition information before reporting please speak to the WPO or the external Whistleblower service.</p>
STEP 2 Report	<p>A Whistleblower can raise a Whistleblower Report, under this Policy, by reporting the matter to either:</p> <ul style="list-style-type: none"> • The RAC President or Chairman of RACWA Holdings: <ul style="list-style-type: none"> - President, Jacqui Ronchi, email jacqueline.ronchi@iinet.net.au, mobile 040 700 2285 - Chairman, Jim Walker, email jimwalker@walkerjim.com, mobile 0459 041 052 • The external Whistleblower service provided by PwC: <ul style="list-style-type: none"> Phone - 1800 223 101. (Business days 8am to 6pm W.A. time) Email - professional.standards@au.pwc.com Post - Professional Standards Manager, GPO Box D198, Perth WA 6840 <p>Reports concerning the CEO, WPO and/or WIO</p> <p>If a report involves either, one or all of, the CEO, WPO or WIO , the report will be directed to the Chairman of RACWA Holdings for investigation and further action.</p> <p>Reporting to Eligible Recipients</p> <p>If a Whistleblower is unable to use any of the above reporting channels, a disclosure can be made to:</p> <ol style="list-style-type: none"> i. An “Eligible Recipient” these include: <ul style="list-style-type: none"> • Officers; • Directors; • Senior Managers; • Auditor or member of an audit team conducting an audit; • Actuaries; or ii. A Regulatory Authority, such as ASIC, APRA, ATO (where related to taxation matters) or other Commonwealth body prescribed by regulation. <p>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.</p>

<p style="text-align: center;">STEP 2 - Report</p>	<p>Public Interest or Emergency Disclosures</p> <p>A whistleblower should contact an independent legal advisor before making a public interest disclosure or an emergency disclosure.</p> <p>If a Whistleblower Report has been lodged with a regulatory body, the Whistleblower is permitted to make a public interest disclosure to a journalist or parliamentarian in the following circumstances;</p> <ul style="list-style-type: none"> • At least 90 days have passed since the disclosure was made to either ASIC, APRA or another Commonwealth body; • The Whistleblower does not have reasonable grounds to believe action is being 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. <p>An Emergency Disclosure can be made in instances where:</p> <ul style="list-style-type: none"> • The Whistleblower has previously made a disclosure to ASIC, APRA or another Commonwealth body; • The Whistleblower has reasonable grounds to believe that there is 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 information provided in the Emergency Disclosure is no greater than is required to inform the journalist or parliamentarian of the substantial and imminent danger.
<p style="text-align: center;">STEP 3 - Investigation</p>	<p>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.</p> <p>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.</p> <p>An investigation may not be possible if the Whistleblower has chosen to remain anonymous or refused to provides a mean of being contacted.</p> <p>Each Whistleblower Report will be assessed to determine whether:</p> <ul style="list-style-type: none"> - It qualifies for protection; and - A formal, in-depth investigation is required. <p>Once a Whistleblower Report is received the WPO will:</p> <ul style="list-style-type: none"> - Endeavour to commence addressing the matter within 5 business days. - Assess the risk of detriment to the Whistleblower and provide appropriate support. - Notify the relevant CEO and Chairs of the board and relevant Board Audit Committee. - Consult with the WIO and/or other experts to seek guidance to determine the best way to handle the matter. - Advise the Whistleblower within 5 business days on how it will be investigated (provided the Whistleblower has provided contact information). - Where appropriate, provide regular progress updates on the status of the investigation, at a minimum on commencement of investigation, progress and completion of investigation.

STEP 3 - Investigation

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.

Any disclosure of 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 Whistleblowers identity; and
- All reasonable steps are taken to reduce the risk that the Whistleblowers identity can be determined from the information; and
- It is reasonably necessary for investigating the issues raised.

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

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

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

The WIO will prepare a 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 Group Audit & Risk Committee or RAC Insurance Pty Ltd Board Audit Committee as appropriate depending on the nature of the Whistleblower Report. Broader trends identified through Whistleblower Reports will be addressed and mitigated in line with RAC's Risk Management Framework.

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