The Richmond Fellowship of Queensland Limited

CGP04– Whistleblower Policy

1. PURPOSE

The Richmond Fellowship of Queensland Limited (**RFQ**) is committed to creating and maintaining an environment where people feel safe and encouraged to report concerning conduct that they observe or suspect. This Policy aims to clarify the processes and protections RFQ provides to allow persons reporting wrongdoing to do so confidentially and without fear of retaliation.

The board of directors (the **Board**) of RFQ is responsible for implementing and reviewing this Policy and any related procedures.

RFQ must comply with the obligations relating to the protection of whistleblowers in the *Corporations Act 2001* (Cth) (**Corporations Act**) and the *Taxation Administration Act 1953* (Cth) (**Tax Act**).

2. SCOPE

This Policy applies to protected disclosures made by whistleblowers.

A **whistleblower** is any eligible person who makes a disclosure, in accordance with this Policy, that qualifies for protection under the Corporations Act or the Tax Act, including:

(a) current and former officers or employees of RFQ (including employees, interns, volunteers, managers and directors);

(b) current and former contractors, consultants, service providers, partners and suppliers of services or goods (whether paid or unpaid);

(c) an associate of RFQ; and

(d) relatives, dependants and spouses of any of the persons listed above.

This Policy applies to disclosures made in relation to conduct occurring within, or connected to, RFQ, whether at RFQ's premises or elsewhere.

3. MAKING A DISCLOSURE

A disclosure qualifies for protection under this Policy if:

(a) the disclosure concerns **reportable conduct** (see section 4 of this Policy),

(b) the disclosure is made to an **eligible recipient** (as defined in section 5 of this Policy),

(c) the disclosure is made to ASIC or another Commonwealth authority prescribed by regulation,

(d) the disclosure is made in accordance with **public interest or emergency disclosure** provisions (see section 5.1 of this Policy),

(e) for tax affairs, the disclosure is made to an eligible recipient, the Commissioner of Taxation, or a legal practitioner for the purposes of obtaining advice.

Disclosures not concerning reportable conduct do not qualify for whistleblower protection, unless otherwise prescribed by law. A Whistleblower may qualify for protection even if the disclosed matter is incorrect or unable to be substantiated.

4. WHAT IS REPORTABLE CONDUCT?

A whistleblower may make a disclosure under this Policy if they have reasonable grounds to suspect any misconduct or improper state of affairs in relation to RFQ (**Reportable Conduct**). Reportable Conduct may include (but is not limited to):

(a) the misappropriation or irregular use of funds, theft, fraud, bribery or money laundering;

(b) unlawful conduct (including theft, violence, criminal damage against property, data privacy violations or other breaches of State or Commonwealth law);

(c) unethical conduct (such as dishonestly altering RFQ records or data, adopting questionable accounting practices or wilfully breaching RFQ's Code of Ethics, or other policies or procedures);

(d) conduct that is potentially damaging to RFQ (including unsafe work practices or health risks);

(e) conduct which may cause financial loss to RFQ or damage to its reputation;

(f) conduct that represents a danger to the public or the financial system; or

(g) harassment, discrimination, victimisation or bullying that is systemic or widespread and is not characterised as a personal work-related grievance as defined in the Corporations Act.

It is important to note that Reportable Conduct can include conduct that may not involve a contravention of a particular law, including information that indicates a significant risk to public safety.

4.1 Personal work-related grievances

Personal work-related grievances are not covered under this Policy and should instead be reported in accordance with RFQ's Formal Disputes Procedure and associated HR policies. Personal work-related grievances are grievances that relate to an individual's current or former employment and have, or tend to have, implications for the individual personally rather than broader implications for RFQ. This includes:

(a) an interpersonal conflict between two or more people;

(b) a decision that does not involve a breach of workplace laws, such as a decision:

  (i) about the engagement, transfer or promotion of an individual;

  (ii) about the terms and conditions of employment; or

  (iii) to suspend or terminate the engagement of an individual, or otherwise to discipline the individual.

There may be situations where a disclosure about or including a personal work-related grievance still qualifies as Reportable Conduct under this Policy, for example, if the disclosure includes information about misconduct, a grievance that is systematic in nature, or relates to detrimental treatment taken against a whistleblower due to making a disclosure under this Policy.

5. WHO CAN A REPORT BE MADE TO?

If a whistleblower has reasonable grounds to suspect or become aware of conduct that is likely to be considered Reportable Conduct under this Policy, a report should be made through one of the channels specified below (**Eligible Recipients**):

Eligible Recipient Contact Details

Method	Details
Email	Board Chair - Chris.Dougherty@rfq.com.au Chief Executive Officer - Kathi.Boorman@rfq.com.au Executive Manager People and Culture - Kenny.Mclachlan@rfq.com.au
Mail	PO Box 655, Annerley QLD 4103 Attention: Board Chair, or Chief Executive Officer, or Executive Manager People and Culture

Disclosures relating to:

(a) operational matters, should be made to the Chief Executive Officer or Executive Manager People and Culture; and
(b) board-level matters, such organisational governance and compliance, should be made to the Board Chair.

Though RFQ encourages whistleblowers to make disclosures to an Eligible Recipient, it is important to note that disclosures of Reportable Conduct made to any of the following may also qualify for protection:

(a) any director or senior manager of RFQ;

(b) an external auditor or actuary of RFQ;

(c) the Australian Securities and Investments Commission (**ASIC**);

(d) the Tax Commissioner; and

(e) a legal practitioner, for the purposes of obtaining legal advice or legal representation in relation to whistleblower protections.

5.1 Public interest and emergency disclosures

Under certain circumstances, disclosures can be made to a journalist or parliamentarian and qualify for protection. This applies to situations where a whistleblower makes a public-interest disclosure or an emergency disclosure. There are strict requirements for each of these disclosures. It is important that a whistleblower understands the criteria to ensure they qualify for protection.

RFQ encourages individuals to seek independent legal advice before making a public interest disclosure or emergency disclosure.

6. ANONYMITY

Disclosures can be made anonymously and still qualify for protection. A whistleblower can remain anonymous when making a disclosure, throughout an investigation, and after an investigation is finalised.

While whistleblowers are encouraged to share their identity when making a disclosure to make it easier for RFQ to address the disclosure, they are not required to do so.

If a whistleblower does not share their identity, RFQ will make a preliminary assessment of the disclosure as if the identity were known. However, there may be some practical limitations in conducting further investigations. Accordingly, whistleblowers who make a disclosure anonymously are encouraged to maintain ongoing communication with RFQ, including by providing contact details for the purposes of requesting further information, providing feedback, or communicating outcomes. However, a whistleblower is under no obligation to provide such details.

A whistleblower can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. Measures that RFQ may adopt to protect anonymity include:

(a) accepting anonymous disclosures submitted to RFQ by mail, email, or any other form of communication method.

(b) redacting identifying information from documents, where practicable; and

(c) using secure methods to store and share information relating to disclosures made in accordance with this Policy.

7. CONFIDENTIALITY

Upon receiving a disclosure of Reportable Conduct under this Policy, RFQ will take all reasonable steps to keep the whistleblower's identity confidential and reduce the risk of disclosure in an investigation.

If a whistleblower reveals their identity when making a disclosure of Reportable Conduct, consent will be sought for the whistleblower's identity to be shared to persons who may be involved in:

(a) the handling, investigating or reporting on the disclosure of Reportable Conduct;

(b) taking disciplinary action based on the investigation of the disclosure; or

(c) making other decisions in relation to the disclosure.

While not obligated to do so, whistleblowers are encouraged to provide consent, as it best enables RFQ to investigate their concerns and take appropriate action.

A whistleblower's identity may be disclosed with or without their consent to:

(a) ASIC, the Tax Commissioner and the Australian Federal Police; or

(b) a legal practitioner for the purpose of obtaining legal advice or representation.

Where it is necessary for information that is likely to lead to a whistleblower's identification to be shared for the purposes of handling or investigating the concern, all reasonable steps will be taken to reduce the risk of the whistleblower's identification.

Measures that will be adopted by RFQ to protect confidentiality include:

(a) ensuring that materials relating to disclosures are stored securely;

(b) ensuring disclosures are handled and investigated by qualified staff; and

(c) issuing reminders about the confidentiality requirements, including that an unauthorised disclosure of a whistleblower's identity may be a criminal offence.

Whistleblowers may lodge a complaint regarding breach of confidentiality with a regulator such as ASIC or the Australian Taxation Office, for investigation.

8. REPORTING PROCEDURES

8.1 What should be included in a report?

A disclosure should, where possible, be in writing and contain details of:

(a) the nature of the alleged Reportable Conduct;

(b) the person or persons responsible for the Reportable Conduct;

(c) the facts on which the whistleblower's belief that Reportable Conduct has occurred, and has been committed by the person named, are founded; and

(d) the nature and whereabouts of any further evidence that would substantiate the Reportable Conduct, if known.

8.2 Investigation

RFQ will carry out a preliminary review of the whistleblower disclosure and will decide whether the conduct raised:

(a) qualifies for protection; and

(b) requires that a formal in-depth investigation be commenced.

RFQ may need to contact the whistleblower to obtain further information or evidence. The extent of an investigation may be limited if RFQ is unable to contact the whistleblower, for example, because a disclosure was made anonymously.

RFQ's response to a whistleblower disclosure will vary depending on the nature of the disclosure (including the amount of information provided).

Investigations may be conducted internally or through external experts and will be:

(a) unbiased and independent,

(b) objective,

(c) timely,

(d) conducted with procedural fairness, and

(e) all reasonable efforts will be made to preserve the confidentiality of an investigation.

All efforts will be made to ensure information obtained is properly secured to prevent unauthorised access.

Appropriate records and documentation will be maintained for each step of the process.

Subject to considerations of the privacy of those against whom the allegations are made and confidentiality, where possible, the whistleblower will be kept informed of:

(a) relevant progress of an investigation; and

(b) relevant outcomes of an investigation.

The frequency and timeframe of the feedback will vary depending on the nature of the disclosure.

The investigation will conclude with a report. To the extent permitted under applicable laws and if determined appropriate by RFQ, RFQ may inform the whistleblower and/or a person against whom allegations have been made of the findings.

Any report will remain the property of RFQ. The method of reporting and documenting the findings will depend on the nature of the disclosure. There may be circumstances where it is not appropriate to provide details of the findings or outcome to the whistleblower and/or a person against whom allegations have been made.

8.3 Persons who are the subject of a disclosure

RFQ will observe the principles of procedural fairness, in particular where an adverse comment about a person is likely to be included in a findings report. Provided that there are no restrictions or other reasonable basis for doing so, the person affected will be given an opportunity to respond and any comments will be considered before the report is finalised.

Generally, where an investigation is conducted and the investigator believes there may be a case for an individual to respond, provided there are no restrictions or other reasonable basis for not doing so, the investigator must ensure that a person who is the subject of a disclosure:

(a) is informed of the substance of the allegations;

(b) is given a fair and reasonable opportunity to answer the allegations before the investigation is finalised;

(c) has their response set out fairly in the report; and

(d) is informed about the substance of any adverse conclusions in the report that affect them.

Measures that will be adopted to ensure fair treatment of individuals mentioned in a disclosure include:

(a) handling disclosures confidentiality, where it is practical and appropriate and to the extent permitted by this Policy;

(b) ensuring an investigation is objective, fair and independent; and

(c) providing access to RFQ's support services.

9. SUPPORT AND PROTECTIONS

9.1 What is detrimental treatment?

RFQ will take all reasonable steps to ensure that a whistleblower suffers no detrimental treatment for making a disclosure protected under this Policy or applicable law.

Detrimental treatment includes any actual or threatened conduct that could cause a detriment, such as:

(a) termination of employment;

(b) injury of an employee in his or her employment;

(c) alteration of an employee's position or duties to his or her disadvantage;

(d) harassment, bullying or intimidation;

(e) personal or financial disadvantage;

(f) unlawful discrimination;

(g) harm or injury, including psychological harm;

(h) damage to reputation;

(i) damage to property;

(j) damage to a business or financial position; and

(k) any other damage to a person.

The following actions will not be considered detrimental treatment:

(a) administrative action that is reasonable for the purpose of protecting a whistleblower from detriment (e.g. moving a whistleblower who has made a disclosure about their immediate work area to another office to prevent them from detrimental treatment); and

(b) managing a discloser's unsatisfactory work performance, if the action is in line with RFQ's performance management framework.

9.2 Protection from detrimental treatment

RFQ will commence the necessary disciplinary action against any individual who, in retaliation for the whistleblower having made, or being eligible to make, a disclosure of Reportable Conduct under this Policy, engages in the detrimental treatment of a whistleblower.

RFQ will adopt the following measures to protect whistleblowers from detrimental treatment, in accordance with this Policy:

(a) assessing the risk of detrimental treatment when a disclosure is made;

(b) providing access to support services (where appropriate);

(c) providing staff training on obligations in respect of the treatment of whistleblowers; and

(d) implementing clear procedures for lodging a complaint about suffering detrimental treatment as a result of making a protected disclosure.

A whistleblower may seek independent legal advice or contact regulatory bodies, such as ASIC or the ATO, if they believe they have suffered detriment treatment that has not been properly addressed by RFQ.

9.3 Compensation and remedies

Compensation and other remedies may be available through the courts if a person suffers loss, damage or injury because of a disclosure and RFQ fails to take reasonable precautions and exercise due diligence to prevent the detrimental treatment.

9.4 Protection from liability

A whistleblower is protected from any administrative (e.g., disciplinary action), civil (e.g., legal action for breach of contract; breach of duty of confidentiality) or criminal liability (e.g., prosecution for unlawfully releasing information) in relation to their disclosure.

A whistleblower can still qualify for protection under this Policy even if the disclosed matter cannot be substantiated, provided the whistleblower did not make the disclosure knowing it was false.

Making a disclosure may not protect the whistleblower from the consequences arising from involvement in any wrongdoing. A person's liability for their own conduct is not affected by their disclosure of that conduct.

10. REASONABLE BASIS FOR MAKING THE DISCLOSURE

Unsubstantiated allegations found to have been made maliciously or knowingly false will be taken seriously and may be subject to disciplinary action, including dismissal, termination of service, or cessation of a service or client relationship.

Protection is not available where the disclosure is trivial or vexatious, with no substance. This will be treated in the same manner as a false report and may itself constitute Reportable Conduct.

Individuals who deliberately submit false reports will not be eligible for the protections under whistleblower laws. There may also be legal consequences if a whistleblower makes a knowingly false report.

11. CONTACTS

For more information about this Policy, contact Praveen Shastry at Praveen.Shastry@rfq.com.au.

12. EFFECTIVE DATE AND REVIEW

This Policy:

(a) takes effect from **31st March 2026;**

(b) supersedes MAP009 – Whistleblower Policy, last reviewed in **February 2020**; and

(c) is due for its next review on **31st March 2028**.

Nothing in this policy is intended to restrict individuals from disclosing Reportable Conduct, providing information to, or communicating with a government agency, law enforcement body or a regulator in accordance with any relevant law or regulation applicable in a jurisdiction in which RFQ operates.

This policy will be made available on the staff intranet, notice boards and website.

This policy may be changed, replaced or removed from time to time at the discretion of the Board of RFQ. This policy does not form part of any agreement between any person and RFQ, nor does it constitute terms and conditions of any person's employment or engagement with RFQ or provide a legal basis for claims against RFQ.

Signature:

Name: Chris Dougherty

Position: Board Chair

ANNEXURE A – WHISTLEBLOWER CONSENT FORM

Acknowledgement and Consent for Disclosure

(a) I have made a disclosure of information, which may involve the reporting of misconduct or an improper state of affairs, relating to The Richmond Fellowship of Queensland (**RFQ**).

I have made this disclosure to: ____*

I have received a copy of the RFQ Whistleblower Policy and understand the protections afforded to whistleblowers, including in relation to confidentiality.

I consent to the sharing of my identity with the persons specified in Schedule 1.

My consent to the sharing of my identity is limited to the extent necessary to allow RFQ to:

handle, investigate and report on the disclosure;

take disciplinary action, or corrective measures, based on the outcome of the handling/ investigation of the disclosure; and

comply with legal obligations under applicable laws.

I confirm that I have had the opportunity to seek independent legal advice regarding this consent.

____ ____

Name of person making disclosure [print] Date

____

Signature of person making disclosure

** Insert name of person receiving report*

Schedule 1 – Persons to whom my identity may be disclosed

Name	Role