RFC Group Whistleblower Policy

Last updated August 2026

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1. Introduction

1.1 Purpose

The RFC Group has a strong commitment to ensuring that all its business activities are carried out in a way that is both ethical and compliant with all applicable laws and promote a culture of transparency and accountability to support its best practice in good corporate governance.

The purpose of this RFC Group Whistleblower Policy (**Policy**) is to:

(a) encourage the reporting of Improper Conduct relating to the RFC Group;

(b) outline the procedure for reporting any Improper Conduct;

(c) provide information about how the RFC Group will investigate disclosures about Improper Conduct;

(d) set out the protections which are available to those who raise concerns or report Improper Conduct.

this policy does not apply to a report which:

(a) relates solely to a personal work-related grievance (see below); or

(b) has no reasonable basis, is deliberately false, malicious or dishonest (see below).

This Policy operates in conjunction with other RFC Group Policies which may also deal with certain types of Improper Conduct. For further details of these policies, please contact the People & Culture team.

1.2 Scope

This Policy applies to anyone who is or has been:

(a) a director, officer, employee, contractor or volunteer of the RFC Group (collectively, **People**);

(b) a supplier of goods and services to the RFC Group, whether paid or unpaid, or their employees);

(c) an associate of any RFC Group Member; and

(d) a relative, spouse or dependent of any of the above individuals;

(eligible whistleblower / you)

1.3 Responsibilities and review

This Policy is owned and approved by the Club's Board and is managed by the Executive General Manager – Legal, Risk & Integrity. It is reviewed by the Club's People Committee every three years (or as considered necessary, such as where there is a material change to applicable laws).

1.4 Further information

If you require more information about this Policy, contact the Executive General Manager – Legal, Risk and Integrity, whose contact details are set out at the end of this Policy. If you require specific information before making a report of Improper Conduct, contact the Whistleblower Officers of the relevant RFC Group Member. Advice can also be sought from an external lawyer. See Appendix 2 for details.

2. Definitions

The following definitions apply for the purpose of this Policy:

APRA means the Australian Prudential Regulation Authority;

ASIC means the Australian Securities and Investments Commission;

Breach of a Law means information indicating that conduct by any RFC Group Member (or one of their officers or employees):

(a) is a breach of the *Corporations Act, the ASIC Act 2001*, the *Banking Act 1959*, the *Financial Sector (Collection of Data) Act 200*1, the Insurance Act 1973, the *Life Insurance Act 1995*, the *National Consumer Credit Protection Act 2009*, the *Superannuation Industry (Supervision) Act 1993* or any instruments made under these Acts; or

(b) is an offence against any other Commonwealth law punishable by imprisonment for 12 months or more or is prescribed by regulation.

Corporations Act means the *Corporations Act 2001* (Cth);

Improper Conduct means the types of conduct outlined in this Policy below;

RFC Group / we means:

(a) Richmond Football Club Ltd (**Club**);

(b) Aligned Leisure Pty Ltd (as the trustee for the Aligned Leisure Trust) (**Aligned Leisure**);

(c) Bachar Houli Foundation Ltd (**Bachar Houli Foundation**);

(d) Islamic College of Sport Ltd (**Islamic College of Sport VIC**);

(e) Islamic College of Sport (NSW) Limited (**Islamic College of Sport NSW**); and

(f) any 'subsidiary' (as defined in the *Corporations Act 2001* (Cth)) from time to time of any of the above entities,

RFC Group Member means any member of the RFC Group;

RFC Group Policies means other policies of RFC Group Members, which apply to each RFC Group Member, either at the RFC Group level or the individual RFC Group Member level including for example:

(a) Equal Employment Opportunity;

(b) Managing Unsatisfactory Performance & Conduct; and

(c) Grievance Process

Tax Administration Act means the *Taxation Administration Act 1953* (Cth);

Tax Misconduct means misconduct, or an improper state of affairs or circumstances in relation to the tax affairs of any RFC Group Member; and

Whistleblower Officer means the people from each RFC Group Member listed in Appendix 1.

3. Who can report?

3.1 Reporting requirements

To be protected under this Policy, you must:

(a) be an eligible whistleblower (as described in "Scope" above);

(b) have **reasonable grounds** to suspect Improper Conduct has occurred; and

(c) report the matter via the reporting channels outlined below.

3.2 What is Improper Conduct?

Improper Conduct is *misconduct* or *an improper state of affairs or circumstances* in relation to any RFC Group Member or by their People.

This includes conduct which is:

(a) dishonest, fraudulent or corrupt (e.g. misappropriation of funds, offering or accepting a bribe, money laundering);

(b) illegal conduct (such as theft, dealing or use of illicit drugs, violence or threatened violence and criminal damage against property);

(c) unethical;

(d) a falsification of accounts, financial irregularities or the manipulation of the internal or external audit process;

(e) a substantial mismanagement of resources;

(f) causing, or may, cause financial loss or damage to an RFC Group Member or damage its reputation and/or its interests;

(g) causing an unsafe workplace or constitutes unsafe work practices;

(h) a substantial risk or danger to the public or public safety, a financial system or the environment;

(i) a Breach of a Law (which may also be covered in the above examples);

(j) Tax Misconduct; or

(k) a retaliation against an eligible whistleblower who has made a report under this Policy.

3.3 What is <u>not</u> improper conduct?

Personal work-related grievances are not Improper Conduct. A personal work-related grievance is a grievance about any matter in relation to the person's current or former employment and has or tends to have implications for the person personally but do *not*:

(a) have significant implications for the relevant RFC Group Member; or

(b) relate to any Improper Conduct.

Examples of personal work-related grievances include:

(a) interpersonal conflicts between employees (e.g. being the subject of harassment, discrimination or bullying); and

(b) decisions relating to the terms and conditions of their employment, the suspension, termination of employment or disciplinary action.

People who believe that they have a personal work-related grievance should raise the matter with the People & Culture team.

However, a personal work-related grievance may be Improper Conduct in the following situations which can be reported under this Policy - if:

(a) the personal work-related grievance report includes information about Improper Conduct, or information about Improper Conduct also includes a personal work-related grievance (a mixed report);

(b) the RFC Group Member has breached employment or other Commonwealth laws punishable by imprisonment of 12 months or more, engaged in conduct that represents a danger to the public, or the report suggests wrongdoing beyond the reporter's personal circumstances;

(c) an employee has suffered, or is threatened with, detriment for making a report (see below); or

(d) an employee has sought legal advice or representation about the protections available to eligible whistleblowers under the Corporations Act.

4. How to report

4.1 Methods of reporting

You:

(a) may report either verbally or in writing using the reporting channels outlined below;

(b) may report anonymously or identify yourself; and

(c) should ensure that the report includes all relevant details, the reasons for your concerns and, where possible, any supporting information.

4.2 Anonymous reporting

There is no requirement to provide your name or identify yourself at any stage during the reporting or investigation process or after an investigation is finalised. You can also decide not to answer questions that you feel may reveal your identity. You can also choose to provide your identity to the person that you make the report to, but not consent to them sharing your identity with anyone else.

The RFC Group Member respects your right not to identify yourself. However, if you choose to remain anonymous, this may affect the RFC Group Member's ability to investigate the report. If you would prefer to remain anonymous, you are encouraged to maintain on-going communication with the RFC Group Member via the Your Call services so that follow up questions can be asked and feedback can be given.

4.3 Confidentiality

To avoid jeopardising any investigation, if you have made a report under this Policy, you must keep confidential the fact that a report has been made (subject to any legal requirements).

5. Who to report to

5.1 Recipients of reports

You can make a report by contacting:

(a) the whistleblowing service – an independently run reporting service operated by Your Call;

(b) RFC Group Member's Whistleblowing Officers; and

(c) an organisation or person who is eligible to receive protected disclosures.

Further information on each reporting option is provided below.

5.2 Your Call hotline

Your Call is an external, independent provider that provides confidential reporting of whistleblower concerns related to this Policy. Reporting to Your Call also enables the report to be made anonymously if you choose to do so. A whistleblower report can be made to Your Call:

(a) online: https:// www.yourcall.com.au/rfc;

(b) by phone using Your Call's external reporting hotline: 1300 790 228 (9am to midnight AEST on business days).

You may elect to:

(a) remain anonymous;

(b) share your details with Your Call only; or

(c) share your details with Your Call and with the RFC Group member.

Your Call will obtain relevant details from you and will provide a report to the Whistleblowing Officers listed below, who will determine the next steps. If the report relates to a Whistleblowing Officer, Your Call will exclude that person from all communications when Your Call provide information about the report to us.

Your Call will provide a unique identification number which will acts as a receipt and a username enabling you to log in to the Your Call message board after making a report. You will be required to save a password as well. This then allows you to continue to communicate with the RFC Group Member about the report via the message board (even if you are anonymous) and securely upload any relevant information or documentation that you wish to provide.

If you are deaf or have a hearing or speech impairment, you can contact Your Call online. If you would like to contact Your Call by phone, you can do so through the National Relay Service. Simply choose the preferred contact method at www.relayservice.gov.au and request Your Call's hotline 1300 790 228.

5.3 Report to a Whistleblower Officer:

Each RFC Group Member has appointed internal Whistleblower Officers to:

(a) receive any reports of Improper Conduct; and

(b) protect eligible whistleblowers and to ensure that you are not the victim of any detriment or reprisal.

Reports should be made to a Whistleblower Officer either in person, by phone, email or mail (the contact details are in Appendix 1).

5.4 Other reporting channels

The RFC Group encourages all reports to be made to Your Call or a Whistleblower Officer to take the appropriate steps to investigate and resolve the matter as quickly as possible. However, reports can also be made to one of the parties listed in Appendix 2 of this Policy.

6. How will the report be investigated?

6.1 Acknowledgement of report

Your Call or the Whistleblower Officer (or other eligible recipient) will acknowledge the receipt of the report of Improper Conduct within 2 business days from the date of the receipt of the report, provided that you are contactable.

6.2 Investigation by Whistleblower Officer

Where a report of Improper Conduct needs to be investigated, an investigation will be conducted by a Whistleblower Officer as soon as possible after the receipt of the report. The RFC Group Member will endeavour to complete the investigation as soon as practicable. However, the process and timeframe for an investigation will vary depending on the nature of the report and available information.

The Whistleblower Officer will:

(a) review supporting information and obtain further information as required;

(b) determine the anticipated timeframe of the investigation;

(c) determine who will be involved in the investigation (i.e. whether other internal or external resources or adviser are required);

(d) The Whistleblower Officer will examine each concern raised and where possible locate evidence that either substantiates or refutes the claims made in the report to determine whether Improper Conduct has occurred;

(e) consider any possible remedial action that may be required; and

(f) report all findings directly to the CEO and the board of the RFC Group Member. Your identity of the person who made the report will not be shared with the CEO or the board of the RFC Group Member without that person's consent.

All investigations will be conducted impartially and objectively in a manner in accordance with the principles of procedural fairness and natural justice.

7. How will you be kept informed?

7.1 Identified reports

If the report is not made anonymously, you will be advised about the investigation process including anticipated timeframes, what has been undertaken, whether the investigation has been completed, and what action is or has been taken to address the Improper Conduct, subject to applicable confidentiality, privacy and other relevant considerations. Frequency of updates and timeframes will depend on the nature of the report. There may be circumstances where it is not appropriate to provide details of the outcome to you.

7.2 Anonymous reports

If the report is made anonymously, the investigation will be conducted based on the information provided to it from the initial report and any follow up correspondence or conversations. If you maintain contact with the RFC Group Member, updates can be provided where appropriate.

8. How will you be protected and supported?

8.1 Protection against detrimental conduct

The RFC Group is committed to the protection of any eligible whistleblower who makes a report under this Policy.

(a) We must not engage in, detrimental conduct towards you (or threaten detriment) because you reported (or are suspected to have reported) Improper Conduct.

(b) Detriment includes:

 (i) dismissal or demotion;

(ii) alteration of a person's position or duties to your disadvantage;

(iii) any form of victimisation, intimidation, harassment or inappropriate pressure;

(iv) discrimination;

(v) harm or injury including psychological harm;

(vi) action causing injury, loss or damage;

(vii) damage to you or your property, reputation, business or financial position; or

(viii) threats, whether express, implied, conditional or unconditional.

(c) Detriment does not include:

(i) any reasonable administrative action taken to protect you from detriment; and

(ii) managing your unsatisfactory work performance in accordance with the RFC Group Member's performance management processes.

The RFC Group will take reasonable steps to protect your welfare including:

(a) assessing the risk of detriment as soon as possible after receiving a report of Improper Conduct and taking steps to prevent it (e.g. modifying working arrangements); and

(b) advising the person of the RFC Group Member's EAP service.

8.2 Protection of identity and confidentiality

All eligible reports received will be kept confidential. The RFC Group Member must not disclose your identity or any information provided in a report, or any information that is likely to lead to your identification, unless an exemption applies.

However, your identity can be disclosed:

(a) if you consent;

(b) if the report is required by law;

(c) to a lawyer for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the *Corporations Act*; or

(d) to ASIC, APRA, the Commissioner of Taxation and the Australian Federal Police.

The information contained in a report can be disclosed with or without your consent if:

(a) the information does not include the discloser's identity;

(b) the RFC Group Member has taken all reasonable steps to reduce the risk that you will be identified from the information; and

(c) it is reasonably necessary for investigating the issues raised in the report.

Any unauthorised release of information to anyone not involved in the investigation (subject to the requirements of this Policy) without your consent will be breach of this Policy.

8.3 Steps taken to protect eligible whistleblowers

The RFC Group Member will:

(a) store all files and records relating to Improper Conduct reports and investigations securely;

(b) limit access to the secure filing system to those directly involved in managing and investigating the Improper Conduct; and

(c) protect your details by redacting personal information where required or where you are contactable, consulting you on information that may lead to your identity being known.

8.4 What to do if you think you have suffered detriment or a confidentiality breach

> If you believe that you have suffered any detriment or confidentiality breach as a result of making a report of Improper Conduct under this Policy, you should contact the person to whom the report was made or a Whistleblower Officer and provide all relevant details accordingly.
>
> You may seek independent legal advice if you believe you have suffered detriment

9. How are people mentioned in reports ensured fair treatment?

9.1 Elements taken into account

The RFC Group Member will ensure fair treatment of any person who is mentioned in a report by:

(a) assessing each report which may then be investigated;

(b) conducting all investigations into reports in an impartial and objective manner to ensure the fair treatment of all people involved;

(c) advising any person mentioned in the report as and when required by principles of natural justice and procedural fairness and prior to any actions being taken (e.g. if the report will be the subject of an investigation);

(d) advising the person of the RFC Group Member's EAP service; and

(e) ensuring an eligible whistleblower knows that they must keep confidential the fact that a report has been made (subject to any legal requirements).

9.2 What disciplinary action may be taken against People?

The RFC Group Member may take disciplinary action (including termination of employment) against current People for:

(a) disclosing the identity of, or subjecting a person they know or suspect to be, an eligible whistleblower to detriment; or

(b) deliberately making a malicious, false or dishonest report of Improper Conduct. Any deliberately malicious, false or dishonest reports will not be protected under this Policy or legislation.

No action will be taken against any People who have made a report on reasonable grounds, regardless of whether any wrongdoing was identified.

Also, under the *Corporations Act* and the *Tax Administration Act*, a person who is in breach of this Policy may also be subject to:

(a) court orders, including orders for compensation, injunctions and damages (see below); and

(b) significant penalties or a period of imprisonment for disclosing an Eligible Whistleblower's identity (outside of the above exemptions) or victimising an Eligible Whistleblower (see below).

10. What are the special protections for eligible whistleblowers?

10.1 Immunity

As an eligible whistleblower, you are not subject to any civil, criminal (other than for making a false disclosure) or administrative liability (including disciplinary action) for making a report about Improper Conduct.

No contractual or other remedy may be enforced against you for making the report.

However, the protections do not grant immunity for any misconduct you have engaged in that is revealed in your report.

10.2 Other remedies or rights to compensation

You can seek compensation and other remedies through the courts if:

(a) you suffer loss, damage or injury because of a report; and

(b) the RFC Group Member failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Other remedies may include apologies, reinstatement, exemplary damages awards and/or injunctions.

Appendix 1: Whistleblower Officers

Club	Contact Details
Hannah Hopper Executive General Manager Legal, Risk & Integrity	Phone: 0412 099 656 Email: hhopper@richmondfc.com.au
Sec Maljanek Chief People Officer	Phone: 0412 150 042 Email: smaljanek@richmondfc.com.au
Nicole Randle Chief Financial Officer	Phone: 0401 134 351 Email: nrandle@richmondfc.com.au
John O'Rourke President	Phone: (03) 9426 4400 Email: jorourke@richmondfc.com.au
Kate Palmer Chair of People Committee	Phone: 0419 599 856 Email: katempalmer@outlook.com

Aligned Leisure	Contact Details
Simon Bryson General Manager Operations	Phone: 0402 289 323 Email: simon.bryson@alignedleisure.com.au
Liam O'Brien Group Operations Manager	Phone: 0438 393 186 Email: liam.obrien@alignedleisure.com.au
John Clark Group Operations Manager	Phone: 0409 399 931 Email: john.clark@alignedleisure.com.au
Alex Lamborn People and Culture Manager – Aligned Leisure	Phone: 0409 800 778 Email: alamborn@richmondfc.com.au

Bachar Houli Foundation	Contact Details
Ali Fahour Executive Director	0433 010 933 afahour@bacharhoulifoundation.com.au
Ahmed Saad Head of Programs	0423 341 416 Ahmed.saad@afl.com.au
Riham Saleh Senior People & Culture Advisor	0403 259 651 rsaleh@richmondfc.com.au

Islamic College of Sport – VIC	**Contact Details**
Ali Fahour Executive Director	0433 010 933 afahour@bacharhoulifoundation.com.au
Hassan Ellahibi Principal	0403 231 413 hellahibi@ics.vic.edu.au
Riham Saleh Senior People & Culture Advisor	0403 259 651 rsaleh@richmondfc.com.au

Islamic College of Sport – NSW	**Contact Details**
Ali Fahour Executive Director	0433 010 933 afahour@bacharhoulifoundation.com.au
Ali Faraj Executive Director	0414 767 415 afaraj@bacharhoulifoundation.com.au
Osman Karalli Principal	0422 934 115 principal@icsnsw.com.au
Riham Saleh Senior People & Culture Advisor	0403 259 651 rsaleh@richmondfc.com.au

Appendix 2: Other reporting channels for improper conduct

<u>You may also report to:</u>

(a) a director or other officer (e.g. company secretary) or senior manager or executive of an RFC Group Member;

(b) an internal or external auditor of an RFC Group Member (including a member of an audit team conducting an audit);

(c) ASIC or APRA;

(d) a lawyer for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the *Corporations Act* or in the *Taxation Administration Act*;

(e) in relation to tax related matters, a registered tax agent or BAS agent who provides tax agent services or BAS services to an RFC Group Member; or

(f) a journalist or parliamentarian (i.e. public interest and emergency disclosures) in limited and specified circumstances only.

> It is important for you to understand the criteria for making a disclosure to journalists and parliamentarians and independent legal advice should be sought before doing so.