

WHISTLEBLOWER POLICY

Whistleblowing means raising genuine concerns in the public interest about dangers, risks, wrongdoing, or malpractice that affect yourself or others and are incompatible with the values of Rangedale Group of Companies. Even seemingly minor matters can be indicative of more significant issues that could damage the company's reputation and culture.

Rangedale Group of Companies is dedicated to achieving strong business performance and maintaining a culture aligned with its values, being Authenticity, Safety, People, Innovation, Reliability & Excellence. To uphold these principles, we have formulated this Whistleblower Policy, with the following aims:

- Encourage employees, service providers, and associates to promptly report suspected wrongdoing, assured that their concerns will be taken seriously, thoroughly investigated, and their confidentiality will be safeguarded.
- Provide guidance on how to raise such concerns effectively.
- Assure employees, service providers, and associates that they can report genuine concerns without fear of reprisals.

What to Report

Whistleblowing involves disclosing information related to suspected wrongdoing or dangers in the workplace. This may include:

- Failure to comply with any legal or professional obligation and/or regulatory requirements.
- Hazards to health and safety.
- Damage to the environment.
- Bribery and corruption.
- Financial fraud or mismanagement.
- Negligence.
- Breach of Rangedale Group of Companies' Values, Code of Conduct, and internal policies and procedures.
- Conduct likely to damage our reputation.
- Unauthorized disclosure of confidential information.
- Deliberate concealment of any of the above matters.

This list is not exhaustive.

Who Should Report

A whistleblower is a person who raises genuine concerns related to any of the above. If you have any such concerns affecting our activities, you should report them under this policy. However, please note that this policy is not intended for complaints relating to your personal circumstances.

Confidentiality and protection of the reporter are fundamental to this policy. The best way to raise a concern is openly through the channels described below. Providing as much information as possible to support your concerns allows Rangedale Group of Companies to quickly determine the next steps and provide feedback on the investigation. Raising a concern anonymously may limit the action that can be taken, as further information may be required for a thorough investigation.

Reporting Channels

To ensure objective management of reports, Rangedale Group of Companies has established a direct line of communication to the Rangedale Board of Directors, to provide an independent Online reporting channel. The Online reporting channel allows employees and external parties, such as suppliers, contractors, tenants, and stakeholders, to report concerns regarding irregularities or questionable behaviour of employees, service providers, or associates.

Contact information for the Online reporting channels is as follows:

Email (only for matters concerning Rangedale Group of Companies): whistleblowing@rangedale.com.au

Dealing with Reports

Your report will be received and reviewed by the Board, who will determine the appropriate initial action. Reports will be provided to relevant parties in the company at the Senior Management level, unless the whistleblowing report is related to the Senior Manager directly.

Confidentiality of the reporter's identity will be maintained at all times, regardless of whether the report was made openly or anonymously. The reporter's identity will only be revealed with their consent.

Rangedale Group of Companies will not tolerate any retaliation against employees who report concerns, and any employees taking action in response to a report will be subject to the disciplinary procedure.

Upon receipt of the report, the Board may:

- Determine whether circumstances warrant an investigation or review, considering factors such as the severity of the issue raised, credibility of the information, and likelihood of confirming the information from attributable sources.
- Instruct the relevant management to conduct further investigations or reviews and take appropriate remedial action.
- Review and investigate the report, ensuring no conflict of interest exists with any person involved in the investigations.
- Engage third parties as the Board deems appropriate to conduct further investigations or reviews and take remedial action if necessary.
- Report the matter to the authorities if deemed necessary upon consultation with legal counsel.
- Take any other action as the Board deems in the best interest of Rangedale Group of Companies.
- Inform the whistleblower of the likely timeline for a final response.
- Recommend any remedial or legal action if necessary.
- Notify the whistleblower of actions taken or reasons if it is decided that no action will be taken.

Maintaining this Policy

Rangedale Group of Companies and the Board are responsible for ensuring the maintenance, regular review, and updating of this policy. Revisions, amendments, and alterations to this policy can only be implemented with the approval of the Board of Directors.