

# Whistleblower Policy

(Approved by Board of Directors 6 March 2026)

## 1. Policy Purpose

Reserve Bank Health Society (RBHS) promotes a culture of integrity and accountability and an environment that encourages and supports people to feel safe to speak up about misconduct.

The purpose of the Whistleblower Policy is to provide guidance for individuals to disclose potential wrongdoing safely, securely and with assurance that they will be supported and protected and to encourage the reporting of such conduct.

This policy also outlines the processes that will be taken in response to whistleblowing reports.

This policy provides transparency around the processes for receiving, handling and responding to disclosures and ensures that disclosures are dealt with appropriately and in a timely manner.

RBHS encourages disclosure of potential misconduct and has adopted an 'if in doubt report' approach to reporting potential misconduct.

## 2. Scope

This policy applies to all RBHS Contractors, Suppliers, Directors, and relatives, dependents and spouses of the aforementioned. This is further detailed in section 5, Eligibility to Make a Disclosure.

This policy does not apply to members; the Complaints Handling Policy should be followed in instances where members are concerned about potential wrongdoing.

## 3. Definitions

Term	Definition
APRA	Australian Prudential Regulation Authority
ASIC	Australian Securities and Investments Commission
Board	Board of Directors of National Health Benefits Australia Pty Ltd
Corporations Act	Corporations Act 2001 (Cth)
Detriment	Detriment includes dismissal, injury in employment, alteration of duties to disadvantage, discrimination, harassment, intimidation, harm or injury, damage to property, damage to reputation, damage to business or financial position, or any other damage to a person.
Eligible Recipient	A person to whom you can make a disclosure to under this policy and detailed further at section 6 of this policy.
Reserve Bank Health Society/ RBHS	Reserve Bank Health Society and its related entities as defined by the Corporations Act.

Peoplecare	Peoplecare Health Limited and its related entities as defined by the Corporations Act. Peoplecare is the contracted management provider for RBHS.
Qualifying Disclosure	A report made by Whistleblower, to an Eligible Recipient, that concerns Reportable Conduct and is made on Reasonable Grounds.
Reasonable Grounds	Objectively reasonable grounds, that a reasonable person in your position would also suspect misconduct or an improper state of affairs or circumstances.
Reportable Conduct	Where a person has Reasonable Grounds to suspect misconduct or an improper state of affairs or circumstances in relation to RBHS. Further detail and examples provided in Section 4.
Whistleblower	The person who makes the disclosure of Reportable Conduct and offered protection under the Corporations Act. The person must satisfy the eligibility criteria in section 5 to be eligible for whistleblower protections.
Whistleblowing	Whistleblowing is the practice of making a disclosure of information when you have Reasonable Grounds to suspect Reportable Conduct.
Whistleblower Investigation Officer (WIO)	WIO may be a RBHS officer, or an external investigator, taking into account the nature and circumstances of the information disclosed.
Whistleblower Protection Officer	Nominated RBHS Executive who has specific whistleblower responsibilities under this policy including the protection and safeguarding of the interests of the Whistleblower.

## 4. Reportable Conduct

RBHS encourages the disclosure of any instances of Reportable Conduct. Individuals should make a disclosure under this policy if they have Reasonable Grounds to suspect that conduct, or a state of affairs exists, in relation to RBHS that is any of the following:

- misconduct, or an improper state of affairs;
- a contravention of any law administered by ASIC or APRA;
- conduct that represents a danger to the public or the financial system (even if this conduct does not involve a breach of a particular law);
- conduct that is an offence against any law of the Commonwealth, where the offence is punishable by imprisonment for a period of 12 months or more.

Reportable Conduct may include:

- criminal activity;
- failure to comply with, or breach of legal or regulatory requirements;
- fraud, bribery or corruption;
- dishonest or unethical behaviour;

- serious or undisclosed conflicts of interest, including those relating to outside business interests, relationships, and improper payments;
- irregular use of company funds or practices (including misleading accounting or financial reporting practices);
- noncompliance with the criteria required as a Fit and Proper person;
- conduct seriously endangering health and safety or causing serious damage to the environment;
- unauthorised use of RBHS's confidential information or intellectual property;
- conduct likely to damage the financial position or reputation of RBHS;
- deliberate concealment of any of the above.

Disclosures that don't relate to Reportable Conduct are not considered whistleblowing and do not qualify for protection under the *Corporations Act*. These disclosures will instead be handled in accordance with the relevant RBHS policies and procedures.

## 5. Eligibility to Make a Disclosure

An individual is eligible to make a disclosure of Reportable Conduct as a Whistleblower if they are:

- a. a current or former officer or associate of RBHS, for example a director or company secretary;
- b. a service provider or contractor who is providing, or has provided goods or services to RBHS, whether paid or unpaid, including their employees; and
- c. a relative, dependent, or spouse of an individual identified in (a) to (b) above.

Disclosures of Reportable Conduct must be made to an Eligible Recipient to be entitled to whistleblower protection under the *Corporations Act*. Disclosures made to someone who is not identified as an Eligible Recipient identified in section 6 of this policy will not qualify for whistleblower protection.

## 6. Eligible Recipients

Disclosures of Reportable Conduct can be made to any of the following Eligible Recipients.

1. RBHS Officials:
  - Director
  - Company Secretary
  - Chief Executive Officer
  - Chief Risk Officer
  - Chief Financial Officer
2. Auditors and Actuaries:
  - Auditor or a member of the appointed auditors for RBHS
  - Actuary of RBHS
3. External Independent Whistleblower Service
  - Your Call (details provided below)

Your Call has been appointed by Peoplecare, as RBHS's contracted managed service provider, to provide a confidential and external process for reporting wrongdoing. Your Call provides secure online reporting across all devices and telephone hotline reporting avenues. Your Call acts as the conduit between the Whistleblower and RBHS. Reports can be made via the phone or online.

Phone: 1 300 790 228

Web: [yourcall.com.au/peoplecare](http://yourcall.com.au/peoplecare)

The Your Call service operates 24 hours a day, seven days a week.

RBHS has an appointed Whistleblower Protection Officer (WPO) who is responsible for safeguarding the interests of Whistleblowers who make disclosures under this policy and to ensure the integrity of reporting. The WPO can also be contacted to obtain more information prior to making a disclosure.

Holly Allen – RBHS Company Secretary  
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Phone: 02 4224 4360

RBHS encourages internal reporting in the first instance. Internal reporting channels provide an early warning system that may allow RBHS to address misconduct before issues escalate to more serious regulatory or reputational issues. Where a Whistleblower doesn't feel comfortable making an internal report or has made a report and no action has been taken within a reasonable timeframe, external reporting and follow up are available through the independent contracted whistleblower service, Your Call.

Disclosures can also be made to a legal practitioner for the purposes of obtaining legal advice or legal representation about the whistleblower requirements.

Disclosures can be made directly to regulatory bodies ASIC and APRA.

In certain circumstances, public interest disclosures or emergency disclosures can be made to a journalist or parliamentarian. There are explicit criteria for making public interest disclosures or emergency disclosures and it is strongly recommended that Whistleblowers obtain independent legal advice in the first instance, to ensure complete understanding of the criteria for making a public interest or emergency disclosure that qualifies for whistleblower protection under law.

## 7. Making a Disclosure

To be eligible for the protection offered to whistleblowers under the *Corporations Act* the disclosure needs to be considered a Qualifying Disclosure.

A Qualifying Disclosure is a disclosure of information from a Whistleblower, as per section 5 of this policy, who has Reasonable Grounds to suspect that the information pertains to Reportable Conduct.

When making a disclosure of Reportable Conduct the Whistleblower should have Reasonable Grounds to suspect the information they are disclosing is true and accurate. Deliberate false reporting will not be covered by this policy and will not be a Qualifying Disclosure.

Reports should provide sufficient detail to enable a thorough assessment of the situation. Sufficient detail includes, but is not limited to:

- Full names of persons against whom the allegation is made;
- Dates, times and locations;
- Factual description of the alleged inappropriate behaviour; and
- Documented evidence, where available.

It is not the role of the Whistleblower to investigate or prove the Reportable Conduct has occurred.

Disclosures are treated confidentially to the extent possible and when a report is made under this policy, either directly to an Eligible Recipient or through the whistleblower hotline, Whistleblowers will be asked how they would prefer their identity to be handled.

Anonymity and use of a pseudonym is allowed; however, this can impact on the efficiency and effectiveness of investigation into any Reportable Conduct. Disclosers who wish to remain anonymous are encouraged to make a disclosure via the Your Call service, which has systems in place to facilitate on-going communication whilst remaining anonymous.

In the event a disclosure of Reportable Conduct involves a member of the Executive Team or a WPO, the disclosure will be escalated to the Chair of Risk Committee or in their absence, the Chair of the Board for assessment and further action.

## **8. Protection for Whistleblowers**

Under the *Corporations Act*, whistleblowers (including those who made reports on an anonymous basis) who meet the eligibility criteria are entitled to specific legal protections. These include the right to have their identity and the information they provide kept confidential, protection from legal action (such as civil or criminal proceedings), and safeguards against any form of detriment such as dismissal, disciplinary action, or other unfair treatment which occurs as a direct result of making a disclosure.

These protections are an essential element to create an environment in which Whistleblowers feel safe to raise Reportable Conduct.

### **8.1 Protection of Information and Confidentiality**

The identity, or information that may lead to the identification of a Whistleblower will be treated in accordance with the *Corporations Act* ensuring that it is held in the strictest confidence and not disclosed to parties unrelated to the investigation.

All information, documents, records and reports relating to the investigation of a disclosure of Reportable Conduct will be confidentially stored and retained in an appropriate and secure manner.

A Whistleblower's identity will not be disclosed without consent unless it is required or authorised by law (for example, where it is reasonably necessary for investigating the issues raised in the disclosure).

In some instances, RBHS may be obliged to share the identity of a Whistleblower to APRA, ASIC or the Australian Federal Police, for example in connection with an investigation into the disclosure or to a legal practitioner for the purpose of obtaining legal advice or representation in relation to the matter of Reportable Conduct.

It is illegal to disclose the identity or information that is likely to lead to the identification of the Whistleblower, except in the circumstances required or authorised by law. Complaints about a breach of confidentiality can be made to the Chief Risk Officer, Your Call or a regulator such as ASIC or APRA.

## **8.2 Protection Against Legal Action**

The *Corporations Act* provides protection for Whistleblowers, including protection from a range of negative consequences that might otherwise arise from making a disclosure. These protections mean that a Whistleblower cannot be subject to criminal charges, and the information they disclose cannot be used against them in a criminal case, unless it turns out the disclosure was deliberately false. Whistleblowers are also protected from civil legal action, such as being sued for breaching an employment contract, confidentiality agreement, or other legal obligations.

This protection does not grant immunity for any misconduct that the Whistleblower may have been involved in that is revealed in the disclosure, although voluntary self-reporting may be considered by the regulator in event of any legal proceedings.

## **8.3 Protection Against Detriment**

A Whistleblower must not be subjected to Detriment because they have disclosed a matter. RBHS encourages the reporting of Reportable Conduct and has safeguards in place to protect Whistleblowers from Detriment arising from the making of a disclosure.

It is unlawful to cause Detriment to any person on the belief or suspicion that a disclosure of Reportable Conduct has been, or will be made, regardless of whether the disclosure was made.

Any concerns of detrimental conduct should be immediately reported to the WPO or Your Call.

## **8.4 Compensation and other Remedies.**

In line with the protections under the *Corporations Act*, if a Whistleblower believes that they have suffered loss, damage or injury because of disclosing Reportable Conduct they may be entitled to seek compensation or other remedies through the courts. Whistleblowers are

encouraged to obtain independent legal advice about their rights and the remedies that may be available to them in such circumstances.

## 9. Investigating a Disclosure

All disclosures of Reportable Conduct will be dealt with promptly, fairly and objectively. RBHS's response to a disclosure will vary depending on the nature of the information provided. All disclosures will be assessed to determine if they can be addressed and resolved informally or if a formal investigation is required.

Upon receipt of a disclosure, the WPO or delegate in case of escalation, will conduct a preliminary assessment to determine whether the disclosure:

- is or may be a legitimate disclosable matter,
- was made by an eligible Whistleblower, and
- can be resolved informally or if a formal investigation is required.

Where reasonably possible and having regard to any confidentiality obligations, the WPO will notify the CEO, where the disclosure does not involve them, within 24 hours of receiving the disclosure and complete the preliminary assessment within 5 business days of receipt of the disclosure.

All disclosures will be acknowledged by the WPO, or delegate in case of escalation, who will be a point of contact for the Whistleblower and keep them informed throughout the process.

### 9.1 Where there is Insufficient Evidence of Reportable Conduct

If it is determined by the WPO that the disclosure does not identify Reportable Conduct or that the discloser is not an eligible Whistleblower, or there is insufficient information or evidence to warrant further investigation, the Whistleblower will be informed at the earliest possible opportunity. The WPO will notify the RBHS Board of the disclosure including the assessment that to support the outcome that it does not meet the criteria for Reportable Conduct.

In that event, no further action will be taken under this policy, and the Whistleblower will be advised accordingly by the WPO.

If the disclosure indicates other inappropriate conduct, for example, harassment, discrimination or bullying, the WPO may, where appropriate, refer the matter for consideration in line with RBHS's relevant policies and procedures.

### 9.2 Where Further Investigation may be Warranted

Where the assessment establishes that the discloser qualifies as an eligible Whistleblower and there is evidence, or a reasonable suspicion of evidence, of Reportable Conduct, the WPO will commence an investigation and notify the Whistleblower, the CEO, the Chair of the Board and Chair of the Risk Committee.

An investigation will commence as soon as reasonably practicable after the completion of the preliminary assessment. An investigation plan will be prepared and approved by the WPO or delegate.

Once the plan has been approved, The WPO will appoint a Whistleblower Investigation Officer (WIO). The WIO may be an officer of RBHS or an external investigator, taking into account the nature and circumstances of the information disclosed. The RBHS board will approve the appointment of the WIO.

The appointed WIO will commence the investigation, ensuring that it is thorough, impartial, and consistent with principles of procedural fairness and confidentiality.

In the event the Board as whole are mentioned in a disclosure, an assessment will determine if any existing directors are excluded from the disclosure or whether the powers of the Board are required to be delegated to oversee the disclosure in line with section 8– Delegation of Board Power of the RBHS Constitution.

Once a determination has been made, the Whistleblower will be informed that the investigation has concluded and, where appropriate, in the determination of the Risk Committee, provided with a summary of the outcome. The level of detail provided may be limited to preserving confidentiality, protecting the privacy and legal rights of individuals, and ensuring compliance with the whistleblower protections under the *Corporations Act*.

### **9.2.1 Evidence Gathering**

An investigation process will depend on the nature of the disclosure and may include, but is not limited to:

- Reviewing documentation such as emails, correspondence, system logs, and financial records
- Conducting interviews with the whistleblower, witnesses, and any individuals subject to the allegations
- Ensuring that all evidence is securely stored and appropriately documented.

### **9.2.2 Confidentiality**

Information will only be disclosed on a need-to-know basis to protect the integrity of the process and the interests of all parties involved.

### **9.2.3 Documenting and Reporting**

The investigation will be documented in accordance with transparency, accountability, compliance and legal and procedural requirements.

All documentation will be securely stored, and where appropriate, records will be anonymised to protect the identity of individuals involved.

An investigation report will be provided to the WPO to progress to the Chair of the Risk Committee to convene a meeting and review the report.

#### **9.2.4 Determination of findings**

The Risk Committee, in collaboration with the Board Chair (if appropriate), will critically review the investigation report and findings to form their view on the appropriate action and to recommend them to the Board for approval.

The Board will convene and review the Risk Committee's recommendations. If the Board agrees, the findings and recommendations will be communicated to the WPO. The WPO will advise the Whistleblower of the outcome. Full details of the outcome may not always be available for reasons relating to confidentiality, privacy, and the legal rights of those concerned.

The WPO is responsible for assigning the recommendations and remediations determined by the Board and, where appropriate, any external regulator notified.

### **10. Fair Treatment**

Any person mentioned in the disclosure or to whom the disclosure relates will be afforded fair treatment and procedural fairness in any investigation, including by being provided with an opportunity to respond to allegations, to the extent possible as determined by RBHS, of Reportable Conduct made against them.

An officer who is implicated may be temporarily stood down whilst an investigation is in process. Any such stand-down may only continue for the duration of the investigation. If the investigation determines that the allegations are not substantiated, the officer must be immediately reinstated to full duties.

### **11. Training and Awareness**

This policy is made available to all officers. This policy is also available on the RBHS website.

All Eligible Recipients are provided training about the policy and their obligations as an Eligible Recipient.

The Risk Committee will be regularly provided with updates on any disclosures. The Risk Committee is responsible for the review of the Whistleblowing Policy and recommending it to the Board.

## 12. Roles and Responsibilities

Role	Responsibility
Eligible Recipient	Receives the disclosure of Reportable Conduct and refers to the WPO or delegate.
Your Call	Independent Whistleblower service provider. Receive reports of Reportable Conduct and refer them to WPO or delegate. This service also allows discloser to make a disclosure to RBHS anonymously.
Whistleblower Protection Officer	Safeguards the interests of the whistleblower making reports under the Whistleblower Policy and ensures the integrity of the reporting mechanism. Their role is to assess the matter and determine the recommended next steps. If an investigation is required, they will assign an appropriate person to investigate it.
Whistleblower Investigation Officer	The person responsible for conducting the investigation, nominated by the RBHS Board. Responsible for gathering evidence and preparing a report on findings.
Chief Executive Officer (CEO)	Sets the tone of the organisation to encourage integrity, transparency, and a culture of reporting. Oversight of the policy and process to ensure resources and protections are in place.
Chief Risk Officer (CRO)	Responsible for maintaining independent oversight over the Whistleblower Policy. In the event the disclosure is about the CRO, this responsibility is delegated to the Chair of the Risk Committee.
Chair of Risk Committee	Oversight of the assessment and investigation process in the event the disclosure of Reportable Conduct involves a member of the Executive Team or a WPO.
Risk Committee	Critically review the investigation report and findings to form their view in relation to appropriate action and will refer their recommendations to the Board for approval.
Board of Directors	Provides oversight of the Whistleblower Policy. Ensures the policy supports ethical governance, monitors reporting trends and outcomes. Responsible for making a final determination taking into consideration the recommendations proposed by the Risk Committee.