



ROTARY AUSTRALIA WORLD COMMUNITY SERVICE LTD (RAWCS)

WHISTLEBLOWER PROTECTION POLICY

Rotary Australia World Community Service Ltd (**RAWCS**) operates and is responsible for projects carried out within Australia through the Rotary Australia Benevolent Society (**RABS**) and overseas through the Rotary Australia Overseas Aid Fund (**RAOAF**). Both entities of RAWCS hold Level 1 DGR status. RAWCS is also the trustee of Rotary Australia Relief Fund, a Level 2 DGR entity. The RARF is prohibited from conducting its own activities other than fundraising, managing the funds and granting those funds eligible organisations (which must be other entities which hold Level 1 DGR status).

This policy applies to RAWCS< RABS< RAOAF and RARF and uses the acronym RAWCS within the policy for each entity.

An officer is defined as any person who holds a RAWCS position at National, Regional, District or Rotary Club level, but does not include a director, employee or volunteer.

Scope of Policy

This policy is designed to enable directors, officers, employees and volunteers of the RAWCS to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

RAWCS requires directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As directors, officers, employees and volunteers of the RAWCS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable directors, officers, employees and volunteers and others to raise serious concerns internally so that RAWCS can address and correct inappropriate conduct and actions. It is the responsibility of all directors, officers, employees and volunteers to report concerns about violations of RAWCS's Code of Conduct or suspected violations of law or regulations that govern RAWCS's operations.

No Retaliation

It is contrary to the values of RAWCS for anyone to retaliate against any director, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of RAWCS. Any director, officer, employee or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or appointment.

Reporting Procedure

RAWCS has an open-door policy and suggests that any director, officer, employee or volunteer share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the RAWCS's Compliance Officer. Supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the RAWCS's Compliance Officer, who has the responsibility to investigate all reported complaints. Directors, officers, employees or volunteers with concerns or complaints may also submit their concerns in writing directly RAWCS Compliance Officer.

Compliance Officer

RAWCS Compliance Officer will be a director of RAWCS and be appointed annually for the ensuing financial year.

The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the RAWCS Ltd Board of Directors of all complaints and their resolution and will report at least annually to the Chair of the Audit & Risk Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The Compliance Officer shall immediately notify the Audit & Risk Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation if not confirmed no action will be taken against that individual. If, however the allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate and fair to all concerned investigation.

Handling of Reported Violations

The Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.