

# Whistleblower policy

## 1 BACKGROUND AND OBJECTIVES

This policy applies to all employees at RiskPoint Group (the “Company”) on a global basis. The Company seeks to conduct business honestly and with integrity at all times. This policy is intended to promote accountability regarding the assets and resources of the Company by allowing eligible persons to safely report serious concerns. The Company encourages all individuals who identify or suspect misconduct or an improper state of affairs to speak up and report their concerns. The Company will seek to protect such individuals from adverse consequences.

This policy utilizes the term Eligible Whistleblowers for the following individuals:

- current or former employees of RiskPoint Group, including officers, directors and board members
- current or former suppliers, or employees of suppliers to RiskPoint Group
- current or former associates of RiskPoint Group

This policy should not be used for complaints relating to personal circumstances, such as Human Resource related work matters. In those cases applicable Human Resource procedures should be used.

## 2 FILING A REPORT

The Company encourages any Eligible Whistleblowers to report concerns regarding any misconduct, anything that gives rise to an improper state of affairs, anything they think may be illegal or otherwise unethical, and any breach of the RiskPoint Group Code of Conduct or conduct that falls short of our standards.

Concerns both suspected and actual, can be reported through the Whistleblower portal, which will then be assessed by the independent appointed person. The report can be filed in any language.

**Whistleblower Portal:** <https://rpgroup.com/whistleblower/>

## 3 CONFIDENTIALITY AND ANONYMITY

The identity and any other information which could identify an individual and the details of the whistleblower report will be handled confidentially. The Company will not disclose the identity of the whistleblower to any person unless:

- the whistleblower provides consent
- the matter is reported to an authority
- the matter is raised with a lawyer for the purpose of obtaining legal advice or representation

When an Eligible Whistleblower makes a report, the Company will discuss with them whether they give consent to their identity being disclosed, and if so, to whom. In some cases, such disclosure can enable better support to the whistleblower and/or further improve investigation of the matter.

When investigating a report, it may be necessary to disclose information to persons assisting with the investigation which could lead to them identifying the whistleblower. The Company will take all reasonable steps to minimize the risk that the whistleblower will be identified.

A whistleblower may choose to report concerns anonymously. However, an anonymous report may limit the Company's ability to investigate as it may not be possible to clarify essential information.

#### **4 WHISTLEBLOWER PROTECTION (NON-RETALIATION)**

RiskPoint Group understands that making a whistleblower report is often done at the risk of personal or professional reprisal. It is important that employees feel they can raise their concerns safely, and without fear of reprisal.

The Company does not tolerate any form of victimisation, punishment, disciplinary or retaliatory action against people who files a whistleblower report and provides a range of protections to Eligible Whistleblowers. Any employee who engages in retaliatory behaviour will be subject to disciplinary action.

A whistleblower has protection from victimisation. Victimisation is where a person causes detriment to another person based on the belief or suspicion that the other person made, may have made, proposes to make, or could make a whistleblower report and that belief or suspicion is or forms part of the reason for the conduct. Victimising conduct also includes threats (express or implied, conditional, or unconditional) of causing detriment. 'Detriment' may come in many forms and includes (but is not limited to):

- dismissal
- injury in a person's employment
- altering a person's employment status to their disadvantage
- discrimination between a person and other employees
- harassment or intimidation
- harm or injury (including psychological harm)
- damage to a person's property, reputation, business, or financial position

Victimisation is misconduct and any similar behaviour is taken seriously. If a person thinks that they have been victimised, or if a person becomes aware that someone else has been victimised, a report should be made immediately to the Human Resources department.

#### **5 INVESTIGATION OF WHISTLEBLOWER REPORTS**

The Company takes whistleblower reports seriously and will investigate all whistleblower reports made under this policy. Specifically the Company will:

- acknowledge receiving the report
- make enquiries about the conduct raised in a way, to the degree possible, that does not jeopardise the confidentiality of the report or lead to the Eligible Whistleblower's identification
- conduct an investigation into the matter. Whistleblower reports will be elevated to executive management, with steps taken to preserve the confidentiality of the whistleblower
- If not possible to carry out an investigation based on the information provided in the whistleblower report, the Company seek to obtain further information
- to the extent appropriate, the Company will report back to the whistleblower on the outcome of the investigation. In some circumstances it may not be possible to provide the whistleblower with all details of the investigation

#### **6 ENSURING FAIR TREATMENT**

Any Company employee may be investigated as a result of a whistleblower report. Investigation may occur without the knowledge of the people identified in the report, either to keep the

identity of the Eligible Whistleblower confidential or to prevent people from suffering detriment as a result of the report.

If the Company identifies an issue which indicates that an individual has engaged in misconduct, the individual concerned will be given an opportunity to be heard prior to any further steps – including disciplinary actions.

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