

NRT GROUP

WHISTLEBLOWER POLICY

2020

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1.1 Introduction

The NRT Group is committed to fostering a standard of conduct and ethical behaviour, that encourages employees and all stakeholders to speak up in relation to matters that are of concern to them.

1.2 Purpose

The purpose of this policy is to:

- a) Provide protections for individuals who disclose wrongdoing;
- b) Improve culture and transparency on how to disclose any wrongdoing;
- c) Encourage more disclosures of wrongdoing; and
- d) Deter wrongdoing by promoting better compliance with laws and increasing awareness that it's likely wrongdoing will be reported.

1.3 What this Policy covers

This Policy covers actions that relate to misconduct resulting from:

- a) A breach of relevant legislation, including Part IVD of the Taxation Administration Act 1953;
- b) An offence against any law punishable by imprisonment; or
- c) Any danger to the public.

1.4 Who and what does this Policy apply to?

This Policy applies to all current and former employees and all stakeholders of the NRT Group, such as officers, contractors, auditors, advisers, consultants and their relatives.

Where employees and stakeholders have reasonable grounds to suspect that an activity or conduct is:

- dishonest or unethical;
 - misconduct;
 - fraudulent, corrupt, financial malpractice, bribery or illegal; or
 - a danger or represents a danger to the public or the financial system
- they should report such activities or conduct in accordance with this Policy.

Conduct that is not reportable under this Policy, include matters that only affect the discloser personally, for example work-related grievances or disciplinary decisions. Matters that do not have any implications for the NRT Group do not fall under this Policy and would not qualify for protection under the Corporations Act. These matters are dealt with by other NRT Group Policies (for example Anti-bullying.)

1.5 How and to whom a disclosure can be made

A disclosure can be made either formally or informally.

Employees and stakeholders are encouraged to raise concerns regarding any perceived or actual wrongdoing internally with their senior manager.

If there are reasons why you don't feel comfortable raising concerns with your immediate manager, you may raise your concerns with any of the following people:

Steve Herman, CEO	Steve.Herman@nrt.com.au	0411 865 788
Malcolm Gibson, Technical Director	Malcolm.Gibson@nrt.com.au	0437 177 276
Amanda Hayes, Finance & Commercial Director	Amanda.Hayes@nrt.com.au	0426 282 122

You can also disclose your concerns anonymously via post, to the NRT Group, Attention to the CEO, Level 43, Rialto Tower South, 525 Collins Street, Melbourne VIC 3000.

If you disclose anonymously, you will have the same protections regardless.

We expect whistleblowers making a disclosure to act in good faith, honestly and be genuinely disclosing misconduct. If it's ultimately found that a disclosure was made for malicious reasons, the NRT Group reserves the right to take appropriate action.

You may also choose to make your disclosure externally to any of the relevant authorities. You will have access to the same protections should you do this, as set out in this Policy.

1.6 After a disclosure is made

You are entitled to make a disclosure without any fear of reprisal or personal disadvantage where your disclosure has been made in good faith. Your disclosure will remain confidential and the NRT Group will act in your best interests to ensure you receive no unfavourable treatment.

Any disclosure made by you, will be treated fairly and reasonably, and all efforts not to identify you, without your consent, will be made.

1.7 Investigating a disclosure

All disclosures will be treated seriously, fairly and objectively, with all legal protections afforded.

The subject person of a disclosure will also be treated fairly, objectively and have available to them, any protections afforded by law.

Disclosures will be assessed, and a reasonable determination will be made whether an investigation should be conducted. Whether an investigation is conducted, or the nature of any investigation conducted, will necessarily depend on the nature of the disclosure.

You as the discloser (if the disclosure is not made anonymously) will be advised whether an investigation will be conducted, and the reasons for that decision.

All investigations will be conducted fairly and as timely as possible, by an appropriately appointed person, depending on the nature of the disclosure made.

The subject person of the disclosure will be advised and given a reasonable opportunity to respond to the disclosure. You will be advised on progress of any investigations carried out.

The findings of an investigation will be reported to the NRT Group CEO and will remain confidential. The NRT Group may decide to take further action depending on the recommendations resulting from any investigations. Further action may include, an explanation, a resolution or reporting the matter further to external authorities.

1.8 Policy accessibility

This Policy is available in the offices of the NRT Group, Level 10, 56 Berry Street, North Sydney, NSW, 2060, or on the NRT Group website, and will be reviewed annually.