

General Document Information		
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Whistleblower Policy

RCCBPO is committed to maintaining the highest standards of integrity and ethical conduct in all aspects of its business operations. As part of this commitment, we encourage all employees to report any concerns regarding fraud, unethical behavior, violations of company policies, or any illegal activities.

1. Purpose

The purpose of this Whistleblower Policy is to provide a framework for reporting and investigating concerns regarding fraud, unethical behavior, violations of company policies, or illegal activities affecting RCCBPO.

2. Scope

This policy applies to all employees, contractors, and business associates that are employed by our organization.

3. Reporting Procedure

- a) Any employee who becomes aware of any unethical behavior, violation of company policies, or illegal activities is encouraged to report such concerns promptly.
- b) Reports should be made in writing and should include, to the extent possible, specific details of the incident(s) in question:
 - dates,
 - times
 - locations
 - individuals involved
 - a detailed report of the incident or situation
 - any supporting documentation
- c) Reports should be submitted to HR Department, who serves as the designated Whistleblower Officer (CHRO) for RCCBPO. Alternatively, reports can be submitted through the company's whistleblower@RCCBPO.com email address. This email can also be accessed by the HR department.
- d) All employees are sensitized about the whistle blower policy in orientation. They are to acknowledge the policy in their synergy portal that explains the procedures and their rights that safe guard them. Refresher policy training will be held annually to reinforce key concepts and to encourage a culture of ethical behaviors where employees will feel confident and supported in making any report.

4. Confidentiality

- a) All reports of fraud, unethical behavior, violations of company policies, or illegal activities will be treated with the utmost confidentiality, consistent with the need to conduct a thorough investigation.
- b) Confidentiality will be maintained throughout the investigation process, and only HR will have access to the information provided.

5. Non-Retaliation

- a) RCCBPO prohibits retaliation of any kind against individuals who report concerns in good faith.
- b) If a whistleblower has been victimized, discriminated or retaliated against, he or she may lodge a written complaint to the CEO or EVP. Such complaints shall be investigated as deemed fit by the CEO or EVP. If as a result of such investigations, an employee is found to have taken adverse personnel action, victimized, or discriminated or retaliated against whistle-blower, the CEO or EVP may recommend action against such employee, which could include termination of employment.
- c) Any employee who engages in retaliatory conduct against a whistleblower will be subject to disciplinary action, up to and including dismissal/termination of employment or contract.

The above protection against victimization, retaliation or discrimination will also be available to employees who offered evidence or made written statements or otherwise participated in the investigations.

6. Investigation Process

- a) Upon receipt of a report, the Whistleblower Officer will promptly initiate an investigation to determine the validity of the concerns raised.
- b) The investigation will be conducted impartially and thoroughly, with due regard for the rights of all individuals involved.
- c) The Whistleblower Officer will communicate the findings of the investigation to appropriate management personnel and take any necessary corrective or disciplinary action.

7. Protection

- a) RCCBPO is committed to protecting whistleblowers from any form of retaliation.
- b) Whistleblowers who believe they have been subjected to retaliation should report such concerns to the Whistleblower Officer immediately.

This Whistleblower Policy is intended to provide a mechanism for reporting and addressing concerns regarding fraud, unethical behavior, violations of company policies, or illegal activities affecting RCCBPO. All employees are expected to comply with this policy and support a culture of integrity and transparency.

8. Warning

It may be noted that an employee who knowingly makes frivolous, misleading or false complaints, or without a reasonable belief as to truth or accuracy of the complaint, will not be protected by this Policy and may be subject to disciplinary action, including termination of his/her employment. This will also apply to those employees who make false statements or give false evidence during the investigations.

9. Additional Enforcement Information

In addition to the Company's internal complaint procedure, employees might also be aware that certain law enforcement agencies are authorized to review potentially fraudulent reports. Certain violations of the Company's policies and practices could even subject the Company and any individual employees involved to civil and criminal penalties. Nothing in this Policy is intended to prevent an employee from reporting information to the appropriate agency when the employee has reasonable cause to believe that a violation of a law has occurred.

10. Review and Revision

A yearly anonymous survey will be sent to all employees via synergy portal where they will provide their feedback on the effectiveness of the Whistle Blower policy. This policy will be reviewed and updated annually or as necessary to ensure it remains effective and compliant with relevant laws and industry best practices.