



Rakon Limited

Protected Disclosure Policy

1. Key Principles

- Rakon values openness, integrity and accountability, and requires compliance with its policies and procedures and ethical standards and applicable laws.
- These behaviours enhance the trust, respect and reputation of Rakon in its business activities.
- All Rakon People are expected to observe these behaviours and be alert to any serious breaches of conduct or laws.
- Rakon People should feel free to raise concerns about actual or suspected wrongful behaviour without fear of discrimination or feeling threatened by doing so.
- Rakon is committed to complying with laws and practices that protect the rights of people who raise concerns about wrongdoings at Rakon or by Rakon People, including the New Zealand Protected Disclosures Act 2000 (**Act**).

2. Purpose and Scope of this Policy

The purpose of this Policy is to:

- make Rakon People feel confident about raising concerns about actual or suspected serious wrongdoings within Rakon;

it explains:

- processes in place at Rakon for reporting and investigating concerns about serious wrongdoing
- the protection available to Rakon People reporting or disclosing a serious wrongdoing
- the nature of behaviours that might be reported under this Policy

and is applicable to:

- employees, directors, contractors, consultants and secondees of Rakon and its subsidiary companies (**Rakon People**) with concerns about serious wrongdoing at Rakon or any of its subsidiaries.

3. Protection of your disclosure

- Your disclosure of a serious wrongdoing will be a protected disclosure if:
 - You believe on reasonable grounds and acting in good faith the information about a serious wrongdoing is true or likely to be true;
 - You report the wrongdoing using the channels set out in this Policy;

- You want the information to be investigated; and
- You want your disclosure to be protected.

- Protection available:
 - You will not be liable in any civil, criminal or disciplinary proceeding for making the protected disclosure.
 - Anyone who retaliates against someone who has made a disclosure of wrongdoing in good faith will be liable to disciplinary action, which may result in dismissal.
 - If you have made the disclosure in good faith believing the information to be true or likely to be true, no action will be taken against you even if no evidence of serious wrongdoing is confirmed by the investigation.

4. How to report serious wrongdoing

You should be mindful of the following matters when making a disclosure:

- A disclosure of a serious wrongdoing may be made to:
 - A member of the People and Capability team
 - The Company Secretary
 - The Chief Financial Officer
 - The Chief Executive; or
 - In the event there is no satisfactory response from them or they are compromised then disclosure may be made to the Chair of the Board or Chair of the Audit and Risk Committee.

- Note:
 - Protection may be lost if disclosure is made publicly or through the media.
 - Concerns which do not appear to amount to serious wrongdoing should be raised in the first instance with your team leader, supervisor or a manager who can most likely address them.
 - If you are involved in the matter you are reporting, disclose this at the outset.
 - You will be advised if your concern should be addressed as a personal grievance.

- It is best if your report is made promptly after you suspect a wrongdoing.
- It is best if you report your concerns in writing clearly identifying the nature of the suspected serious wrongdoing and the people involved.

5. What might be a Serious Wrongdoing?

The sorts of behaviour that might amount to serious wrongdoing include:

- Fraud, dishonesty or corruption
- Conduct that constitutes a significant risk to health, safety and the environment
- Conduct that is oppressive, improperly discriminatory or grossly negligent
- Illegal activities (including theft, violence, drug use or sale)

This list is not exhaustive. If you are not sure about the seriousness of a matter, you should discuss it with one of the people referred to in Section 4 above.

6. Investigation

Disclosures of suspected serious wrongdoing made in accordance with this Policy will be investigated:

- A person receiving an allegation of wrongdoing must examine the allegation and get back to the person making the disclosure within 20 working days of receipt advising the outcome or whether a fuller investigation is necessary.
- The information may need to be disclosed to another person within Rakon to ensure the appropriate people are involved in the investigation.
- The process and timing of the investigation and the people who will need to be involved will be discussed with you.
- Rakon will treat all disclosures in a confidential manner unless you consent to disclosure or if disclosure is permitted under the Act, which includes disclosing your identity if it is essential to permit an effective investigation of the allegation of wrongdoing.
- All investigations must be conducted in a manner that is fair, objective and affords natural justice to all people involved.

7. Responsibility

The key responsibilities of Rakon People in relation to this Policy are set out below:

- All Rakon People are responsible for complying with this Policy.
- Team leaders, supervisors and managers must ensure their team members are aware that concerns about serious wrongdoing may be disclosed under this Policy.
- Rakon People who receive a disclosure of a concern about a serious wrongdoing expecting protection under this Policy and/or the Act must ensure they follow the investigation process outlined in this Policy.
- The Board of Directors has overall responsibility for monitoring compliance with this Policy.
- Advice of all protected disclosures and the process followed in investigating and resolving allegations concerning serious wrongdoing must be provided to the Chief Executive and/or Company Secretary.
- The Chief Executive and/or Company Secretary must provide a report on compliance with this Policy to the Audit and Risk Committee and the Board at least annually to assist the Board in monitoring compliance with this Policy.

8. Review

This Policy is to be reviewed by the Board on a bi-annual basis, or more frequently if necessary.

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| Date of last review | May 2019 |
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